UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DON LIPPERT, et al.,)
Plaintiffs,) No. 10-cv-4603
v.)
) Judge Jorge L. Alonso
JOHN BALDWIN, et al.,) Magistrate Judge Daniel G. Martin
)
Defendants.)

FINAL PRETRIAL ORDER
EXHIBIT 3—PLAINTIFFS' EXHIBIT LIST

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 2 of 124 PageID #:11016

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
1			2011 Wexford Contract.			
2	Settlement Discovery 000744	Settlement Discovery 000776		Quality improvement documents.		
3	Wexford #12 p. 33	Wexford #12 p. 40	Dixon Monthly Primary Medical Service Reports.			
4	Settlement Discovery 000884	Settlement Discovery 001039		Year of 2014 log book for off-site medical treatment.		
5	DOC 043401	DOC 043561	Wexford Daily Activity Reports for Stateville.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 3 of 124 PageID #:11017

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
6			Final Report of the Court Appointed Expert (unredacted), no appendices.			
7				Email chain among several re Wexford Issues. Attachment Outstanding Vendor Issues (2).doc.		
8				Email from Lisa Moss to many re Facility Listing October2012 REVISED. Attachment Facility Listing October2012.doc.	401: This document does not make plaintiff's claims more or less probable. The document is an email containing the names of medical staff at each correctional facility. The document does not indicate whether there are any inadequacies or delays in treatment. The document merely lists the names of the medical staff at each facility.	
9	IDOC Update 001591	IDOC Update 001598		Emails between Shannis Stock and Louis Shicker re Medical Grievances.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 4 of 124 PageID #:11018

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
10	IDOC Update 000900	IDOC Update 000900		Email from Marna Ross to several re STV.	403: Although this email indicates that there is inadequate training for healthcare supervisors, the unfair prejudice of this document grossly outweighs its probative value. The document is probative of whether or not there are inadequacies in the training for healthcare unit supervisors. However, the statements made in this email do not indicate whether the inadequacies in training health care supervisors relates to inadequacies in treatment for prisoners. The language used by Marna Ross could be unfairly interpreted by a fact finder that high level officials were aware of inadequate health care treatment for prisoners.	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 5 of 124 PageID #:11019

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
11	IDOC Update 001581	IDOC Update 001590		Collection of emails involving Louis Shicker's opinions of employees' competency.		
12	IDOC Update 001693	IDOC Update 001704		Collection of emails involving Louis Shicker's re Complaint to Vendor and Office of Health Services stat request.	403: Even though this email indicates existance of deficiencies in health care, the probative value of this email is outweighed by its prejudice to the jury. Although the sender indicates that there are deficiencies at a few correctional facilities, it does not indicate the level or extent of these defincies. The email merely requests a list of the facilities that include backlogs. The email does not indicate whether these backlogs have led to delays in patient care or have caused prisoners injury. The prejudice of the blanket statement that the facilities listed in the	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 6 of 124 PageID #:11020

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					email should be included in a report indicating backlogs in healthcare does not reveal the extent of the inefficiencies in each facility. As a result, the email's comments about the prison facilities are overly prejudicial because the email is not probative of the level or effect of the backlogs	
13				Email from Louis Shicker to several re Staffing at Stateville.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 7 of 124 PageID #:11021

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
14	IDOC Update 001575	IDOC Update 001575		Email chain involving Louis Shicker re Dr. Ahmed - resignation today.	403: The majority of the statements in this email are relevant. However, extranneous comments made by the author of the email carry a level of unfair prejudice and have the potential to distract the trier of fact. The statements regarding the state of crisis being ordered at Dixon could be admitted, however Marna Ross' comments about her vacation, "oh goody, goody, back to ground zero", and "R.A.I.S.E the Standard" should be redacted if the exhibit is offered into evidence.	
15	IDOC Update 001688	IDOC Update 001692		Emails between Mike Atchison and Louis Shicker re AD requirements / Audit concerns.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 8 of 124 PageID #:11022

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
16	IDOC Update 001034	IDOC Update 001051		Collection of emails involving Louis Shicker re medical back logs.		
17			Final Report of the Court Appointed Expert (redacted), with appendices.			
18	RFP#5_W exford Contracts 000294	RFP#5_W exford Contracts 000559	2011 Wexford Contract.			
19			Prison Health Care: Costs and Quality - PEW Trusts Report.			
20	RFP#5_Ut ilization Manageme nt 000013	RFP#5_Ut ilization Manageme nt 000019	Wexford Utilization Management Guidelines. Region: Internal.			
21	RTP#5_Th ird Party Analyses- Studies- Reports 000001	RTP#5_Th ird Party Analyses- Studies- Reports 000120	NCCHC Resources, Inc. Technical Assistance Report, IDOC Health Services.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 9 of 124 PageID #:11023

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
22	RFP#5_W exford	RFP#5_W exford	February 2017 Dixon Healthcare Contract			
	Monitorin	Monitorin	Monthly Performance			
	g_Dixon	g_Dixon	Monitoring Report.			
	000273	000288				
23			IDOC's response to the August 2014 Confidential Draft Report of Dr. Shansky.			
24	IDOC	IDOC	IDOC AD 04.03.103			
	Update	Update	effective 2/1/14 re			
	000016	000021	Offender Health Care Services.			
25			Excerpts from NCCHC Guidelines for the Management of an Adequate Delivery System.			
26			Excerpts from NCCHC Standards for Health Services in Prisons 2014.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 10 of 124 PageID #:11024

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
27			Cover of Clinical Practice in Correctional Medicine, Second Ed., by Michael Puisis.		401: The document should be excluded on relevance grounds because it does not contain any information that makes plaintiff's claims more or less probable. Although the document is the title cover of a treatise by Dr. Puisis (Plaintiff's Expert) this evidence can be elicited by testimony and is unneccessary. The document merely contains a coversheet/title page for a manual/treatise on correctional medicine. The document does not contain any information relating to the standards of care or treatments administered by IDOC.	
28			John Howard Association 2014 Monitoring Report - Northern Reception and Classification.		•	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 11 of 124 PageID #:11025

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
29			State Prison Health Care Spending - An Examination - PEW Trusts Report.			
30				Memo from Cindy Hobrock to Louis Shicker re August, 2013 Activity Report.		
31				Email from Edwin Bowen to Louis Shicker re Vacancies.		
32			IDOC Critical Healthcare Vacancies.			
33			Declaration of Debra Pattison.			
34			May 2017 Stateville Healthcare Contract Monthly Performance Monitoring Report.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 12 of 124 PageID #:11026

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
35	Response to Eleventh Motion to Compel 001015	Response to Eleventh Motion to Compel 001015		Spreadsheet of FY15 spending and outstanding payments by facility.	401: The document appears to have conditional relevance if Plaintiff is able to provide information showing that the expenditures below were in regards to medical treatment. Without substantive evidence in support of this argument, this document bears little evidence on IDOC's ability and provision of adequate treatment to inmates. Without evidence showing what the expenditures listed in the document are in regards to, the document is not probative of the plaintiff's claim.	
36	Response to Eleventh Motion to Compel 001016	Response to Eleventh Motion to Compel 001019		Spreadsheet of vouchers and remittance descriptions, mostly for Vandalia.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 13 of 124 PageID #:11027

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
37				Spreadsheet of comprehensive medical, ancillary costs, AIDS/HEP C, dialysis and statewide hospitalization costs for FY10-FY18.		
38				Spreadsheet of remittances to vendors.		
39				Spreadsheet of invoice amounts, dates and vendors.		
40				Spreadsheet of vouchers and remittance descriptions.		
41	RTP#5_E SI 0212349	RTP#5_E SI 0212356		Email from Jared Brunk to Louis Shicker, Bryan Gleckler and Gladyse Taylore re increased medical costs. Attachment IDOC FY-15 Revised Budget.pdf.		
42			2011 Wexford Contract.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 14 of 124 PageID #:11028

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
43	Response to Eleventh Motion to Compel 000906	Response to Eleventh Motion to Compel 000932		Facility budget and reconciliation sheets.		
44	RTP#5_E SI 0052418	RTP#5_E SI 0052421		Email chain involving Louis Shicker re Hill CC Medical Back log.		
45	RTP#5_E SI 0273398	RTP#5_E SI 0273416		Email chain involving Jared Brunk re Complaint to Vendor Forms. Several Notices of complaint to vendor forms attached.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 15 of 124 PageID #:11029

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
46	RTP#5_E SI 0275568	RTP#5_E SI 0275569		Email chain involving Jared Brunk re Wexford Penalties.	401 and 403: The information in these emails regard whether IDOC has ever levied a penalty against Wexford. Although these emails are probative of plaintiff's claim they do not indicate whether any penalties were actually levied against Wexford. Even further, the emails themselves do not reveal any information that makes plaintiff's claim more or less probable. Even if these documents were found to be relevant, the prejudice of the emails outweighs the probative value. The emails do not indicate whether Wexford was actually fined. However, the implication posed by the email's request implies that there have been problems without Wexford. Without positive information	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 16 of 124 PageID #:11030

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					indicating that a penalty was actually levied against Wexford, the emails lack probative value and are more likely to mislead the fact finder into believing that IDOC actually levied penalties against Wexford.	
47	Response to Eleventh Motion to Compel 002333	Response to Eleventh Motion to Compel 002340		Spreadsheets involving medical credits.		
48	RTP#5_E SI 0096417	RTP#5_E SI 0096418		Email chain involving Jared Brunk and Michael Dempsey re Inpatient and outpatient questions.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 17 of 124 PageID #:11031

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
49	RTP#5_E SI 0346209	RTP#5_E SI 0346218		Email chain involving Jared Brunk and Edwin Bowen re Job descriptions for Wexford contract monitors. Includes attachments.		
50	RTP#5_E SI 0129542	RTP#5_E SI 0129545		Email chain involving Jared Brunk, Louis Shicker, Melvin Hinton and others re Appointment to Subcommittee. Attachment 9/15/15 memo from Melvin Hinton to all subcommittee members re Subcommittee on Health Care Contractual Monitoring and Oversight.		
51	RTP#5_E SI 0281071	RTP#5_E SI 0281072		Email chain between Jared Brunk and Christa Bull re If I misspoke.	401: The emails contained in the exhibit and the extraneous comments located in them do not make plaintiff's claim more or less probable. Although there is mention of missing items in the email, it is unclear if the missing items are medical supplies or anything	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 18 of 124 PageID #:11032

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					related to the care or treatment of prisoners. Without any verifying information to give this document context, the document lacks relevance and would only lead to confuse the trier of fact about IDOC record keeping.	
52	Response to Eleventh Motion to Compel 000328	Response to Eleventh Motion to Compel 000389	Illinois State Legislature FY 2018 Narrative Statement.		401 and 407: The information contained in this document contains evidence of proposed remedial measures for the IDOC healthcare system. Aside from conclusory remarks made in regards to the allegations in the Lippert litigation,t he information contained in the document does not make plaintiff's claims more or less probable as they do not indicate whether or not there was any negligence or deficiencies in IDOC	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 19 of 124 PageID #:11033

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					healthcare. The evidence of proposed measures within the document are barred under rule 407 if used as evidence of IDOC's failure to provide adequate healthcare.	
53	Response to Eleventh Motion to Compel 000043	Response to Eleventh Motion to Compel 000061	Illinois State Legislature FY 2017 Narrative Statement.		Same arguments as the above cell.	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 20 of 124 PageID #:11034

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
54	Response to Eleventh Motion to Compel 000309	Response to Eleventh Motion to Compel 000327		Attachments to an Illinois State Legislature Narrative Statement.	401: Although the issue of understaffing is probative of plaintiffs claim, this document does not make the allegation of inadequate staffing more or less probable. The document is a redacted list of IDOC employees that have disabilities. The document does not indicate whether or not these employees were incapable of providing adequate care or if this is an inappropriate number of members to have staffed. If anything, the document has the potential to mislead the fact finder into believing that IDOC staff are not capable of performing healthcare duties appropriately because they may or may not have a disability. The presence of an IDOC employee with a disability on its own does	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 21 of 124 PageID #:11035

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					not indicate whether these conditions led IDOC to provide constitutionally inadequate healthcare.	
55	RTP#5_E SI 0334676	RTP#5_E SI 0334679		Email from Lindsay Amerson to Jared Brunk re EO Reserves. Attachment 1.25.2015 IDOC FY15 Budget Reductions_Reserves (2).xlsx.	401: The document discusses the method for IDOC to receive a credit for Wexford services and how the credit is applied against bills for Wexford services. Despite the document relating to the interactions and relationship between IDOC and Wexford, the document does not indicate whether the use	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 22 of 124 PageID #:11036

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					or expenditures related to this credit have result in delays or inadequate treatments that support Plaintiff's claims. As a result, the mention that IDOC receives credits for Wexford services is not relevant towards the issue of whether the treatments provided by IDOC through wexford are constitutionally inadequate.	
56	RTP#5_E SI 0185135	RTP#5_E SI 0185138		Email chain involving Jared Brunk re FY17 Budget Documents. Attachment FY17 and FY18 Concerns.docx.		
57	RTP#5_E SI 0184785	RTP#5_E SI 0184788		Email from Jared Brunk to several re FY17 and FY18 Concerns. Attachment FY17 and FY18 Concerns.docx.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 23 of 124 PageID #:11037

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
58	RTP#5_E SI 0370441	RTP#5_E SI 0370444		Email chain involving Jared Brunk and Andrew Munemoto with no subject. Attachment 426- DOC.xlsx.		
59	RTP#5_E SI 0251671	RTP#5_E SI 0251812		Email from Gladyse Taylor to several re Medical Subcommittee #3. Attachments IDOC- Medical RFP V 15.2 Template 1124.docx and Executive Summary - New Contract.docx.		
60	RTP#5_E SI 0305184	RTP#5_E SI 0305185		Email chain involving Jared Brunk and Alexander Boucher re Pew Survey on Correctional Health Care Spending - Illinois.	401: This email was sent to Jared Brunk regarding IDOC expenditures on healthcare. Despite the email's mention of IDOC spending on healthcare services provided by Wexford, the email does not make mention of how much IDOC is spending on healthcare and whether these budgetary allocations are causing delays or issues in treating inmates. As a result, the	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 24 of 124 PageID #:11038

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					document does not make the Plaintiff's claims more or less probable, and instead, merely mentions that Jared Brunk is assisting with IDOC's review of budget expenditures.	
61	RTP#5_E SI 0132707	RTP#5_E SI 0132717		Illinois Pew Survey of Correctional Health Care Expenditures.		
62	RTP#5_E SI 0178422	RTP#5_E SI 0178442		Email from Tina Jepsen to several re Hill CC Contract Monitoring. Attachment copy of monthly performance report April 2016 Hill CC.xlsx.		
63	RTP#5_E SI 0275745	RTP#5_E SI 0275749		Email from Jared Brunk to Andrew Munemoto and Lindsay Amerson re Updated sheets for tomorrow's meeting.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 25 of 124 PageID #:11039

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Attachments FY17 walk down.pdf and budget explanation.xlsx.		
64			2016 State of Illinois Request for Proposal - IDOC Comprehensive Medical and Mental Health Services.			
65	RTP#5_E SI 0086819	RTP#5_E SI 0086820		Email chain involving Charlie Weikel, John Baldwin, Brent Gibson and others re SOW for NRI engagement.	403 and 407: The document pertains to IDOC plans to restructure its healthcare system and search for additional healthcare providers. The remedial measures mentioned in this email cannot be used to show negligence or culpability on the part of IDOC. Even if the judge finds this email admissable under 407, the document's probative value is outweighed by the unfair prejudice of the fact finder hearing that IDOC is	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 26 of 124 PageID #:11040

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					looking for other health care providers and plans	
					to restructure its health	
					care system. Similar to the 407 argument, this	
					evidence is likely to	
					prejudice the trier of fact	
					into believing that IDOC	
					is changing its policies	
					because the current health	
					care system is flawed.	
					Further, the email contains	
					little evidence of what	
					policies are causing unsatisfactory healthcare	
					in the opinion of IDOC	
					administrative officials.	
					As a result, the email	
					should not be admitted as	
					either evidence of	
					subsequent remedial	
					measures or as unfairly	
					prejudicial to the fact	
					finder.	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 27 of 124 PageID #:11041

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
66	RTP#5_E SI 0455475	RTP#5_E SI 0455692		Email chain involving Steven Meeks, Kimberly Butler and others re Medical RFP. Attachments comprehensive medical and mental health services RFP.docx and IL DOC vendor questions 2.2.17 (2).docx.		
67	RTP#5_E SI 0073017	RTP#5_E SI 0073017		Email chain involving Gladyse Taylor, Georgia Man and others re Meeting.	401: The information contained in this email lacks relevance because it does not pertain to healthcare standards, treatment, financing, or issues related to services provided by Wexford. The email merely grants the recipient permission to meet with Wexford and reminds them that they do not have the authority to discuss the "RFP" or "contract extensions"	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 28 of 124 PageID #:11042

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
68				Spreadsheet of FY15 spending and outstanding payments by facility.		
69				Collection of different documents and emails regarding compliance, vacancies and penalties.		
70	Response to Eleventh Motion to Compel 000309	Response to Eleventh Motion to Compel 000309		Attachments to an Illinois State Legislature Narrative Statement.		
71	Response to Eleventh Motion to Compel 000062	Response to Eleventh Motion to Compel 000080	Illinois State Legislature FY 2017 Narrative Statement.			
72	RTP#5_E SI 0065036	RTP#5_E SI 0065051		Email chain involving Charlie Weikel re Wexford Contract Analysis. Attachments violation overview.xlsx and Wexford contract reporting requirements.docx.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 29 of 124 PageID #:11043

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
73	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Mike Atchison re		
	0167591	0167592		Governor's Staff Tour.		
74	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Melvin Hinton, Charlie		
	0180666	0180666		Weikel, Gladyse Taylor		
				and others re		
				Subcommittee -		
				monitoring and oversight		
				notes. Attachment 9/16/15		
				Subcommittee on Health		
				Care Contractual		
				Monitoring and Oversight		
				Subcommittee Report.		
75	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Melvin Hinton, Charlie		
	0182571	0182576		Weikel, Gladyse Taylor		
				and others re		
				Subcommittee -		
				monitoring and oversight		
				notes. Attachment 10/25/15 memo from		
				Melvin Hinton to Charlie		
				Weikel re Subcommittee -		
				monitoring and oversight		
				notes email 10/25/15.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 30 of 124 PageID #:11044

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
76				Email chain involving Charlie Weikel, John Baldwin and Louis Shicker re NCCHC Accreditation.		
77	RTP#5_E SI 0180543	RTP#5_E SI 0180543		Email chain involving Charlie Weikel, John Baldwin and others re Please review: SOW - NRI.		
78	RTP#5_E SI 0606815	RTP#5_E SI 0606815		Meeting minutes from UIC-IDOC collaboration meeting involving Charlie Weikel, Erin Johnson, Camile Lindsay, Steven Meeks, Michael Dempsey and John Baldwin.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 31 of 124 PageID #:11045

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
79	RTP#5_E SI 0096023	RTP#5_E SI 0096027		Email chain involving Charlie Weikel, Brent Gibson, John Baldwin and others re RFP. Attachment Illinois DOC mental health services initial assessment 2015 initial plan 10.26.15.docx.	403 & 407: This email is in regards to an evaluation of IDOC correctional medicine by the reviewing organization NCCHC Resources Inc. The NCCHC's report states that the goal of the organization is to evaluate IDOC and make recommendations for improvements in regards to the ongoing Rasho and Lippert litigation. This document does not indicate that there are any current deficiencies in IDOC healthcare. However, this information can potentially prejudice the trier of fact into believing that the presence of the NCCHC presumptively means that IDOC was aware that its current healthcare system was inadequate. As such, the probative value of this evidence in regards to	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 32 of 124 PageID #:11046

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					actual deficiencies in IDOC health care is outweighed by the unfair prejudice carried by the hiring of a consultant to improve IDOC healthcare. Furthermore, this evidence should be barred if it is used as circumstantial evidence to show that IDOC's healthcare system is deficient.	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 33 of 124 PageID #:11047

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
80	RTP#5_E SI 0344460	RTP#5_E SI 0344469		Email chain involving Charlie Weikel, Brent Gibson, LaShonda Hunt and others re IDOC SOW. Attachments Budget narrative for IL DOC 11.23.15.docx, IL letter to NRI for RFP engagement.eml.	argument as the above cell. Although these emails and the attached report relate to health care, the emails and documents do not carry any probative value in determining whether IDOC's health care system is constitutionally inadequate. The emails and report merely indicate and describe the logistics and costs for IDOC's healthcare system to be evaluated by the NRI. The indication that IDOC has hired consultants to evaluate its healthcare system is highly prejudicial and outweighs any probative value in regards to plaintiff's claims. Further, rule 407 bars the admission of this evidence if this document is used as circumstantial evidence of IDOC's	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 34 of 124 PageID #:11048

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					culpability and negligence in providing adequate healthcare.	
81	RTP#5_E SI 0011179	RTP#5_E SI 0011185		Email chain involving Michael Knauer, Jared Brunk, Gladyse Taylor and others re DOC Health RFP.		
82	RTP#5_E SI 0159773	RTP#5_E SI 0159895		Email chain involving John Baldwin, Charlie Weikel, Brent Gibson and others re Illinois DOC Health Care Technical Assistance Report. Attachment IDOC full report_final_delivered.pdf .		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 35 of 124 PageID #:11049

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
83	RTP#5_E SI 0178957	RTP#5_E SI 0178959		Email chain involving Charlie Weikel, Gladyse Taylor, John Baldwin and others re Information on Incruse Ellipta inhaler.	403: Although this evidence pertains to the relationship between IDOC and Wexford, these emails contain little probative information regarding actual quality of healthcare provided by Wexford. The emails reference an incident involving an inhaler but do not indicate whether this incident was a failure in delivering medication or just a routine medication supply issue. The emails also discuss penalties for Wexford. The emails do not indicate that any penalties have been assessed against Wexford or if Wexford's actions have actually resulted in penalties towards them. Furthermore, it is also unclear if these penalties are in regards to instances of Wexford providing	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 36 of 124 PageID #:11050

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
					inadequate medical treatment. Without further information, the mention of penalties lacks context and carries the potential of biasing the fact finder. As a result, the probative value of the relationship between Wexford and IDOC is outweighed by the prejudicial effect of hearing that IDOC is penalizing Wexford.	
84	RTP#5_E SI 0068483	RTP#5_E SI 0068484		Email chain involving Charlie Weikel, John Baldwin, Michael Dempsey and others re Medical check-ins.		
85	RTP#5_E SI 0015386	RTP#5_E SI 0015389		Email from Edward Jackson to several re Subcontracting notices - INA and AFSCME.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 37 of 124 PageID #:11051

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Attachments AFSCME subcontracting1.docx, INA subcontracting1.docx.		
86	RTP#5_E SI 0583091	RTP#5_E SI 0583092		Email chain and meeting invitation involving Charlie Weikel, Michael Dempsey, Steven Meeks and others re IDOC and UIC engagement.		
87	RFP#5_W exford Contracts 000560	RFP#5_W exford Contracts 000598	State of Illinois Contract Renewal of Healthcare Services.			
88			June 2017 Illinois River Healthcare Contract Monthly Performance Monitoring Report.			
89	Response to Motion to Compel 002341	Response to Motion to Compel 002470	IDOC Director's Transition Report.			
90	Response to Motion to Compel 002472	Response to Motion to Compel 002494		PowerPoint presentation re IDOC projects between July 2015 through June 2016.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 38 of 124 PageID #:11052

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
91	RTP#5_E SI 0065946	RTP#5_E SI 0065947		Email chain involving Anthony Galullo, Charlie Weikel and John Baldwin re Wexford contract analysis.		
92	RTP#5_E SI 0483023	RTP#5_E SI 0483024		Email chain involving John Baldwin, Louis Shicker and Amber Bolden re Our meeting.		
93	RTP#5_E SI 0250142	RTP#5_E SI 0250142		Email chain between Charlie Weikel and John Baldwin re NCCHC accreditation - earlier question.		
94	RTP#5_E SI 0623498	RTP#5_E SI 0623498		Email from Louis Shicker to several re vendor staffing and backlogs.		
95	RTP#5_E SI 0497425	RTP#5_E SI 0497427		Email chain involving Charlie Weikel, Gladyse Taylor, John Baldwin and others re Information on Incruse Ellipta inhaler.		
96	RTP#5_E SI 0409310	RTP#5_E SI 0409312		Email chain involving Jared Brunk, Camile Lindsay, Gladyse Taylor and others re Medical RFP.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 39 of 124 PageID #:11053

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
97	RTP#5_E SI 0623447	RTP#5_E SI 0623449		Email chain involving Wallace Strow, Michael Dempsey, Lois Lindorff, Kimberly Butler and others re Strow response to reprimand.		
98	RTP#5_E SI 0044133	RTP#5_E SI 0044134		Email from Steven Meeks to John Baldwin and others re Strategic plan. Attachment OHS Strategic plan.docx.		
99	Wexford #12 p. 1	Wexford #12 p. 8	Big Muddy River Monthly Primary Medical Service Reports.			
100	RTP#5_E SI 0381031	RTP#5_E SI 0381032		Email from Lisa Prather to Michael Dempsey and Kim Hugo re ??.		
101	RTP#5_E SI 0095024	RTP#5_E SI 0095025		Email chain involving Kim Hugo, Michael Dempsey, Kimberly Butler and others re Menard nursing crisis.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 40 of 124 PageID #:11054

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
102	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Steven Meeks, Kim Hugo,		
	0096016	0096017		Lawrence Frank and		
				others re Nursing staff		
102	DEDUG E	DTD#5 E		Menard CC.		
103	RTP#5_E	RTP#5_E		Email chain involving		
	SI 0046529	SI 0046530		Lisa Prather, Gail Walls and others re HCU		
	0040329	0046330		minimum staffing.		
104	RTP#5_E	RTP#5_E		Email chain involving		
104	SI	SI		Cheri Laurent, Kim Hugo		
	0421000	0421001		and others re Nursing staff		
	0.21000	0.21001		at Pinckneyville.		
105	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Shannis Stock-Jones,		
	0609558	0609559		Susan Griffin and others		
				re SWICC ASR LPN		
				hours.		
106	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Natalie Northern, Joseph		
	0622044	0622046		Ssenfuma, Emily Ruskin		
				and others re Sorry.		
107	RTP#5_E	RTP#5_E		Email from Lorie Smalley		
	SI	SI		to Lisa Johnson and others		
100	0622761	0622762		re Staffing.		
108	RTP#5_E	RTP#5_E		Email chain between		
	SI 0622760	SI 0622771		Joseph Ssenfuma and		
	0622769	0622771		Jason Orkies re Contract		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 41 of 124 PageID #:11055

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				monitoring report september 2017.		
109	RTP#5_E SI 0099462	RTP#5_E SI 0099480		Email from Kim Hugo to Steven Meeks re RFP Hill. Several attachments re RFP questions.		
110	RTP#5_E SI 0392582	RTP#5_E SI 0392583		Email chain involving Kimberly Butler, John Baldwin and others re Assisted living facility.		
111				LinkedIn profile of Andy Munemoto.		
112				List of deposition topics.		
113				Pages 274-278 of FY2019 State Budget re IDOC.		
114	Subpoena to Wexford 10-10-17 Request 12 p. 507	Subpoena to Wexford 10-10-17 Request 12 p. 519	State of Illinois Contract Renewal of Healthcare Services.			
115	RTP#5_E SI 0410410	RTP#5_E SI 0410412		Email from Shannis Stock-Jones to several re staffing vacancies/medical backlogs. Attachment		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 42 of 124 PageID #:11056

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				staffing vacancies 12.12.16.xls, medical backlogs 12.12.16.xls.		
116			Wexford Provider Handbook: Physicians, Psychiatrists, Dentists, Nurse Practitioners, and Physician Assistants.			
117	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 592	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 592		Spreadsheet from Lawrence CC showing vacancies and waiting lists.		
118	Subpoena to Wexford 10-10-17 Request 23 p. 580	Subpoena to Wexford 10-10-17 Request 23 p. 580		Spreadsheet showing weekly MHP backlogs for all facilities over 11/24/17 through 12/15/17.		
119	RTP#5_E SI 0132707	RTP#5_E SI 0132717		Pew Institute and Vera Institute of Justice survey of correctional health care expenditures.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 43 of 124 PageID #:11057

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
120	Subpoena to Wexford 10-10-17 Request 4 p. 3606	Subpoena to Wexford 10-10-17 Request 4 p. 3619		Email from Emily McMaster to several re Peer review for Dr. Khurana by Dr. Sood. Attached peer review.		
121	Subpoena to Wexford 10-10-17 Request 5 p. 549	Subpoena to Wexford 10-10-17 Request 5 p. 549		Discipline report for employees 7/1/15 to 11/26/17 for misconduct or performance.		
122	RTP#5_E SI 0064473	RTP#5_E SI 0064479		Email from Mary Schantz to several re c16-bmr-005. Attached 9/10/15 memorandum and investigation re Gary Gerst negligence and conduct of individual.		
123	RTP#5_E SI 0073927	RTP#5_E SI 0073946		Collection of emails involving several re Sood at Hill. Attachments Dr. Sood email.docx, Dr. Sood correspondence 2016.pdf, Zaya v. Sood.pdf.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 44 of 124 PageID #:11058

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
124	RFP#5_Ut ilization Manageme nt 000001	RFP#5_Ut ilization Manageme nt 000012	Wexford Utilization Management Policies and Procedures. Region: Internal.		401 and 403: Defendants object to the attachment which includes the Seventh Circuit case where Dr. Sood was a Defendant.	
125	Wexford #18 p. 1	Wexford #18 p. 60	Wexford Employee Handbook.			
126	Various	Various		Various medical records of Debra Pattison.		
127				List of names with "Lippert" typed at the top.	401: Defendants object as this document is not relevant. The list does not make an issue of consequence to the litigation more or less probable than without it.	
128				"Addendum" created by Katherine Tople. Title IDOC Comprehensive Medical and Mental Health Services.		
129				"Notice" created by Darrell R. Marcy. Title IDOC Comprehensive Medical and Mental Health Services.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 45 of 124 PageID #:11059

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
130	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Lisa Prather, Steven		
	0596316	0596324		Meeks, and several others		
121	DTD#5 E	DTD#5 E		re Priority! Dental chairs.		
131	RTP#5_E	RTP#5_E		Email from Joseph Ssenfuma to several re		
	SI 0590462	SI 0590462		Pontiac CC.		
132	RTP#5_E	0590462 RTP#5_E		Email chain involving		
132	SI	SI		Lisa Prather, Kim Hugo,		
	0594689	0594692		Mary Klein and others re		
	0334003	0394092		ASR equipment.		
133	Various	Various		Collection of emails		
133	Various	v arrous		involving Sandra Funk,		
				Edwin Bowen, John		
				Baldwin and others re		
				Help, Revised Agency		
				Projects List, and Round		
				Table - Western IL CC.		
134	RTP#5_E	RTP#5_E		Email chain between		
	SI	SI		Jennifer Clem-Pierce and		
	0616080	0616080		Jared Brunk re Wexford.		
135	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Jared Brunk, Le Chen and		
	0622127	0622128		Markus Veile re IDOC		
				update/plans for Wexford		
				Payments.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 46 of 124 PageID #:11060

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
136	RTP#5_E SI	RTP#5_E SI		Email chain involving Jared Brunk, Frank		
	0616186	0616187		Lawrence, Charlotte Scott		
	0010100	0010107		and others re Dr.		
				Caldwell.		
137	RTP#5_E	RTP#5_E		Email from Le Chen to		
	SI	SI		Jared Brunk and others re		
	0621718	0621718		IDOC update/plans for		
				Wexford payments.		
138	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Steven Meeks, Gladyse		
	0587784	0587787		Taylor, Jared Brunk and		
				others re Medical RFP		
139	DTD#5 E	DTD#5 E		Q&A. Email chain involving		
139	RTP#5_E SI	RTP#5_E SI		Jared Brunk, Scott Harry,		
	0621937	0621938		Andy Munemoto and		
	0021737	0021730		others re Wexford		
				pending vouchers.		
140	Response	Response		Facility budget and		
	to	to		reconciliation sheets.		
	Eleventh	Eleventh				
	Motion to	Motion to				
	Compel	Compel				
	000906	000933				
141			Declaration of Jared			
			Brunk.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 47 of 124 PageID #:11061

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
142	Response to Eleventh Motion to Compel 003422	Response to Eleventh Motion to Compel 003485	Illinois State Legislature FY 2018 Narrative Statement.			
143	RTP#5_E SI 0057894	RTP#5_E SI 0057898		Email chain involving Tim Lawrence, Jared Brunk, John Baldwin, Bobby Shady and others re 1115 waiver - potential DOC contributions.		
144	RTP#5_E SI 0607599	RTP#5_E SI 0607851	State of Illinois Department of Corrections Department-Wide Financial Audit for the year ended June 30, 2016 and Compliance Examination for the two years ended June 30, 2016.			
145	RTP#5_E SI 0095234	RTP#5_E SI 0095272		Email from Tracey Williams to several re Gender informed practice assessment (GIPA). Attachment The Gender Informed Practice Assessment (GIPA)		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 48 of 124 PageID #:11062

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Summary of Findings & Recommendations for Logan CC.		
146			John Howard Association Monitoring Visit to Stateville Northern Reception & Classification Center 2012.			
147	RTP#5_E SI 0277733	RTP#5_E SI 0277770		Email chain involving Louis Shicker, Marna Ross and others re JHA Response Due 2/22/13. Attachment Draft John Howard Association Monitoring Visit to Stateville Northern Reception & Classification Center 2012.		
148	RTP#5_E SI 0079641	RTP#5_E SI 0079774		Email from Nicole Wilson to John Baldwin re Final Report. Attachment July 2016 Gender Informed Practice Assessment (GIPA) for Logan CC.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 49 of 124 PageID #:11063

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
149			John Howard Association Special Prison Monitoring Report. Overcrowded, Underresourced, and Ill- Conceived: Logan Correctional Center, 2013/14.			
150			John Howard Association Monitoring Visit to Dixon Correctional Center 2013.			
151			John Howard Association Monitoring Visit to Stateville Correctional Center 2013.			
152			John Howard Association Monitoring Visit to Pontiac Correctional Center 2013.			
153			John Howard Association Monitoring Visit to Vandalia Correctional Center 2012.			
154			John Howard Association Monitoring Visit to Graham Correctional Center 2013.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 50 of 124 PageID #:11064

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
155	RTP#5_E SI 0098770	RTP#5_E SI 0098797		Email from Kimberly Butler to several re JHA Report. Attachment John Howard Association 2016 Prison Monitoring Project Summary and Recommendations Part II.		
156	RTP#5_E SI 0098798	RTP#5_E SI 0098825		Email from Kimberly Butler to several re John Howard. Attachment John Howard Association 2016 Prison Monitoring Project Summary and Recommendations Part II.		
157				Email chain involving Melvin Hinton, Louis Shicker and others re Draft JHA Dixon Report. Attachment Draft John Howard Association 2013 Monitoring Visit to Dixon Correctional Center.		
158				Email from Lori Killam to several re Minutes - Monthly Staff Meeting. Attachment 12/16/14 Programs & Support		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 51 of 124 PageID #:11065

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Services Monthly Staff Meeting minutes.		
G159				All monthly contract monitoring reports produced by defendants.	Defendants object. This hyperlink does not link to a single exhibit.	
G160				All CQI reports/minutes produced by defendants.	Defendants object. This hyperlink does not link to a single exhibit.	
G161			[Exhibit number not used]			
G162				All medical records of Don Lippert produced by defendants or obtained from IDOC	Defendants object. No hyperlink given.	
G163				All medical records of Milam Martin produced by defendants or obtained from IDOC	Defendants object. No hyperlink given.	
G164				All medical records of Debra Pattison produced by defendants or obtained from IDOC	Defendants object. No hyperlink given.	
G165				All medical records of Lewis Rice produced by defendants or obtained from IDOC	Defendants object. No hyperlink given.	

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 52 of 124 PageID #:11066

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
G166				All medical records of Ezell Thomas produced by defendants or obtained from IDOC	Defendants object. No hyperlink given.	
167	RTP#5_E SI 0036999	RTP#5_E SI 0037004		Email chain involving Cheri Laurent, Bryan Gleckler, Louis Shicker and others re Wexford key vacancies. Attachment Illinois Recruitment Activities through 4.1.14 providers.doc.		
168	Lippert subp. #19 p. 275	Lippert subp. #19 p. 1123		Collection of emails, documents and reports pursuant to request 19 of the 6/12/15 Wexford subpoena, "Documents relating to communications between Wexford and IDOC since July 1, 2012 related to complaints, concerns, problems, or issues related to the provision of healthcare to inmates, including performance or failures of performance		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 53 of 124 PageID #:11067

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				under the Wexford/IDOC contract."		
169	Subpoena to Wexford 10-10-17 Request 13 p. 9104	Subpoena to Wexford 10-10-17 Request 13 p. 9203	Packet 2: Pricing Proposal. IDOC Medical and Mental Health RFP 16-97556 bid by Wexford.			
170	Subpoena to Wexford 10-10-17 Request 13 p. 9204	Subpoena to Wexford 10-10-17 Request 13 p. 11075		Wexford RFP bid schedules D1, D2, D3, D4 and E for each facility for each fiscal year 2018 to 2028.		
171			2016 State of Illinois Request for Proposal - IDOC Comprehensive Medical and Mental Health Services.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 54 of 124 PageID #:11068

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
172	Subpoena to Wexford 10-10-17 Request 13 p. 12345	Subpoena to Wexford 10-10-17 Request 13 p. 13604	Packet 1: Specifications / Qualifications / Statement of Work. IDOC Medical and Mental Health RFP 16-97556 bid by Wexford [excerpts].			
173	Subpoena to Wexford 10-10-17 Request 13 p. 11328	Subpoena to Wexford 10-10-17 Request 13 p. 11347	Packet 3: Offeror's Offer. IDOC Medical and Mental Health RFP 16- 97556 bid by Wexford.			
174	RTP#5_U PDATED_ SHICKER RFP 000001	RTP#5_U PDATED_ SHICKER RFP 000109		Draft v.15.2 State of Illinois Request for Proposal.		
175	RTP#5_U PDATED_ SHICKER RFP 000110	RTP#5_U PDATED_ SHICKER RFP 000113		PDF titled "New contract - Louis Shicker's comments - meeting results brg."		
176	RTP#5_U PDATED_ SHICKER RFP 000116	RTP#5_U PDATED_ SHICKER RFP 000117		PDF titled "Shicker RFP Recommendations."		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 55 of 124 PageID #:11069

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
177	Subpoena to Wexford 10-17-17 Request 12 p. 11585	Subpoena to Wexford 10-17-17 Request 12 p. 11610		Budget schedule Es for each facility 5/1/16 to 4/30/17.		
178	RTP#5_E SI 0006569	RTP#5_E SI 0006598		Budget schedule Es for each facility 5/1/17 to 4/30/18.		
179	Subpoena to Wexford 10-17-17 Request 12 p. 11611	Subpoena to Wexford 10-17-17 Request 12 p. 11640		Budget schedule Es for each facility 5/1/18 to 4/30/19.		
180	CONTRA CT 00001	CONTRA CT 00162	Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and Wexford Health Sources, Inc. 2006- 05-001.			
181	CONTRA CT 00163	CONTRA CT 00165	Amendment 1 to Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 56 of 124 PageID #:11070

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
			Wexford Health Sources, Inc. 2006-05-001.			
182	CONTRA CT 00166	CONTRA CT 00166	Amendment 2 to Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and Wexford Health Sources, Inc. 2006-05-001.			
183	CONTRA CT 00199	CONTRA CT 00240	Contract Renewal 1 to Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and Wexford Health Sources, Inc. 2006- 05-001.			
184	CONTRA CT 00241	CONTRA CT 00280	Contract Renewal 2 to Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and Wexford Health Sources, Inc. 2006- 05-001.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 57 of 124 PageID #:11071

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
185	CONTRA CT 00281	CONTRA CT 00292		Contract Obligation documents and signed contract amendment administrative orders.		
186	Wexford #11 p. 1	Wexford #11 p. 12	State of Illinois Contract Amendment.			
187	RFP#5_W exford Contracts 000560	RFP#5_W exford Contracts 000598	State of Illinois Contract Renewal of Healthcare Services.			
188	Subpoena to Wexford 10-10-17 Request 12 p. 11285	Subpoena to Wexford 10-10-17 Request 12 p. 11297	State of Illinois Contract Renewal of Healthcare Services.			
189	Subpoena to Wexford 10-10-17 Request 12 p. 507	Subpoena to Wexford 10-10-17 Request 12 p. 519	State of Illinois Contract Renewal of Healthcare Services.			
190	Subpoena to Wexford 10-10-17 Request 12 p. 498	Subpoena to Wexford 10-10-17 Request 12 p. 506	State of Illinois Contract Amendment.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 58 of 124 PageID #:11072

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
191	Subpoena to Wexford 10-10-17 Request 12 p. 11298	Subpoena to Wexford 10-10-17 Request 12 p. 11310	2018 State of Illinois Contract Renewal of Healthcare Services.			
192	RFP#5_W exford Contracts 000001	RFP#5_W exford Contracts 000293	Contract for Services between Illinois Healthcare and Family Services Illinois Dept. of Corrections and Wexford Health Sources, Inc. 2006- 05-001.			
193	RFP#5_W exford Contracts 000294	RFP#5_W exford Contracts 000559	2011 Contract Between Wexford and IDOC.			
194	Response to Eleventh Motion to Compel 000390	Response to Eleventh Motion to Compel 000390	Quarterly Reconciliation Report - Wexford Health Sources - 10/1/15 to 12/31/15 - Stateville RC Correctional Center.			
195	Response to Eleventh Motion to	Response to Eleventh Motion to	Quarterly Reconciliation Report - Wexford Health Sources - 10/1/15 to 12/31/15 - Stateville Correctional Center.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 59 of 124 PageID #:11073

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Compel 000391	Compel 000391				
196	Response to Eleventh Motion to Compel 000392	Response to Eleventh Motion to Compel 000392	Quarterly Reconciliation Report - Wexford Health Sources - 1/1/16 to 3/31/16 - Stateville RC Correctional Center.			
197	Response to Eleventh Motion to Compel 000392	Response to Eleventh Motion to Compel 000392	Quarterly Reconciliation Report - Wexford Health Sources - 1/1/16 to 3/31/16 - Stateville Correctional Center.			
198	Response to Eleventh Motion to Compel 000394	Response to Eleventh Motion to Compel 000431	Illinois State Legislature FY 2016 Narrative Statement.			
199	Response to Eleventh Motion to Compel 000431	Response to Eleventh Motion to Compel 000451	Illinois State Legislature FY 2015 Narrative Statement.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 60 of 124 PageID #:11074

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
200	Response to Eleventh Motion to Compel 000453	Response to Eleventh Motion to Compel 000473	Illinois State Legislature FY 2016 Narrative Statement.			
201	Response to Eleventh Motion to Compel 000474	Response to Eleventh Motion to Compel 000492	Illinois State Legislature FY 2017 Narrative Statement.			
202	Response to Eleventh Motion to Compel 000512	Response to Eleventh Motion to Compel 000538		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2011.		
203	Response to Eleventh Motion to Compel 000539	Response to Eleventh Motion to Compel 000583	IDOC Fiscal Year 2011 ISL Narrative.			
204	Response to Eleventh Motion to	Response to Eleventh Motion to		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2012.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 61 of 124 PageID #:11075

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Compel 000584	Compel 000613				
205	Response to Eleventh Motion to Compel 000614	Response to Eleventh Motion to Compel 000684	IDOC Fiscal Year 2012 ISL Narrative.			
206	Response to Eleventh Motion to Compel 000685	Response to Eleventh Motion to Compel 000713		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2013.		
207	Response to Eleventh Motion to Compel 000714	Response to Eleventh Motion to Compel 000779	IDOC Fiscal Year 2013 ISL Narrative.			
208	Response to Eleventh Motion to Compel 000780	Response to Eleventh Motion to Compel 000805		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2014.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 62 of 124 PageID #:11076

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
209	Response to Eleventh Motion to Compel 000806	Response to Eleventh Motion to Compel 000851	IDOC Fiscal Year 2014 ISL Narrative.			
210	Response to Eleventh Motion to Compel 000852	Response to Eleventh Motion to Compel 000877		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2015.		
211	Response to Eleventh Motion to Compel 000878	Response to Eleventh Motion to Compel 000905		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2016.		
212	Response to Eleventh Motion to Compel 000906	Response to Eleventh Motion to Compel 000933		Spreadsheets of quarterly payments / reconciliations due to Wexford for each facility for FY 2017.		
213	Response to Eleventh Motion to	Response to Eleventh Motion to		Responses to ISL questions for FY 2017.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 63 of 124 PageID #:11077

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Compel 000934	Compel 000952				
214	Response to Eleventh Motion to Compel 000953	Response to Eleventh Motion to Compel 001014	IDOC Fiscal Year 2018 ISL Narrative.			
215	Response to Eleventh Motion to Compel 001015	Response to Eleventh Motion to Compel 001019		Financial spreadsheets. Filename "High Level All Sites Pymnts vs Inv Q1 to Q4 FY15."		
216	Response to Eleventh Motion to Compel 001020	Response to Eleventh Motion to Compel 002332		Various spreadsheets. Filename "IDOC Appropriation 05-1-15 to 7-30-15."		
217	Response to Eleventh Motion to Compel 002333	Response to Eleventh Motion to Compel 002340		Various financial spreadsheets. Filename "IL HFS - Summary - CY1-5."		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 64 of 124 PageID #:11078

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
218				Password-protected Excel spreadsheet information regarding bills paid from the IDOC hospital appropriations fund and which were processed for payment between 7/1/09 and 6/30/18. The password for this document is IDOCclaims10_18. This is responsive to the Plaintiffs' Eleventh Motion to Compel.		
219				Cover email from Kevin Lovellette to Camille Bennett and others attaching password-protected Excel spreadsheet information regarding bills paid from the IDOC hospital appropriations fund and which were processed for payment between 7/1/09 and 6/30/18.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 65 of 124 PageID #:11079

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
220				Email from John Hayes to Camille Bennett confirming that "the spreadsheet you attached covers all paid hospitalization claims through the time period in the spreadsheet." The spreadsheet refers to the password-protected Excel spreadsheet information regarding bills paid from the IDOC hospital appropriations fund and which were processed for payment between 7/1/09 and 6/30/18 produced on 2/14/18.		
221				Excel file of spreadsheets spanning FY10-FY18 showing medical expenditures.		
222	RTP#5_E SI 0285848	RTP#5_E SI 0285849		Email chain between Marna Ross and Louis Shicker re questions and FYI's.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 66 of 124 PageID #:11080

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
223	RTP#5_E SI 0279438	RTP#5_E SI 0279454		Email from Lisa Moss / Louis Shicker to several re Health Services Quarterly meeting 03-02-11. Attaches 3/2/11 Quarterly Health Services Meeting minutes.		
224	RTP#5_E SI 0218301	RTP#5_E SI 0218339		Email from Steven Meeks to several re Sheridan Caseload. Attachment Sheridan updated MD line scheduled appts.xls.		
225	RTP#5_E SI 0169997	RTP#5_E SI 0170005		Email from Louis Shicker to several re Mortality conferences. Attachments Mortality Conference Reports July 31 and June 30.		
226	RTP#5_E SI 0130886	RTP#5_E SI 0130886		Email chain involving Doug Mote, Victor Calloway, Marna Ross and others re Dr. Obaisi, infirmary admits, medical permits, etc.		
227	RTP#5_E SI 0068580	RTP#5_E SI 0068585		Email from Louis Shicker to several re Mortality Reviews. Attachment		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 67 of 124 PageID #:11081

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				mortality conference February 5, 2016.docx.		
228	IDOC Update 001020	IDOC Update 001021		Chain of emails involving Amber Allen, Louis Shicker and others re timeliness of UIC appointments.		
229	IDOC Update 000922	IDOC Update 000923		Chain of emails involving Cheri Laurent, Louis Shicker and others re Dental.		
230	IDOC Update 000843	IDOC Update 000858		Chain of emails involving Louis Shicker, Juliana Chan, Marna Ross and others re Pontiac - Missing HCV and HIV doses.		
231	IDOC Update 003350	IDOC Update 003352		Email chain involving Louis Shicker, Hector Garcia, Cheri Laurent and others re Denials for Stateville CC.		
232	RTP#5_E SI 0095723	RTP#5_E SI 0095724		Email chain involving Steven meeks, Lisa Prather, Kelly Moeller and others re Wexford MD hours.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 68 of 124 PageID #:11082

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
233	RTP#5_E SI 0096355	RTP#5_E SI 0096361		Email from Althea Williams to Lisa Prather, Michael Dempsey and Steven Meeks re Office of Health Services Meeting Minutes 1/20/17. Attachment Office of Health Services 1/20/17 teleconference minutes.		
234	RTP#5_E SI 0095934	RTP#5_E SI 0095937		Email from Lois Lindorff to several re Directors report. Attachment Directors report.doc.		
235	RTP#5_E SI 0097341	RTP#5_E SI 0097342		Email chain involving Donald Mills, Jackie Mitchell, Walter Nicholson, Steven Meeks, Camile Lindsay and others re Murphy M42534.		
236	RTP#5_E SI 0048190	RTP#5_E SI 0048192		Email involving Cindy Hobrock, Mark Williams and Lois Lindorff re Nursing assignments 2017. Attachment 3/8/17 memorandum to nursing staff re nursing assignments.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 69 of 124 PageID #:11083

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
237	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Joseph Ssenfuma, Michael		
	0381134	0381135		Dempsey, Melissa		
				Badowski and others re		
220	DTD#5 E	DTD#5 E		Issues at Pontiac.		
238	RTP#5_E	RTP#5_E		Email from Mike		
	SI 0246166	SI 0246166		Atchison to Gladyse		
	0240100	0240100		Taylor, Kimberly Butler, Kim Hugo and Edwin		
				Bowen re Western Illinois		
				infirmary conditions.		
239	RTP#5_E	RTP#5_E		Email from Lois Lindorff		
237	SI	SI		to Cindy Hobrock and		
	0245613	0245613		Tina Jepsen re Repair.		
240	0212012	0210010		Email chain involving		
				James Reinhart, Theodore		
				Chung, Emily Mattison		
				and others re Epars for		
				IDOC Health Services.		
241	RTP#5_E	RTP#5_E		Email chain involving		
	SI	SI		Eric Dailey, Jan Bryan,		
	0055519	0055540		Nick Little and others re		
				Wexford draft language		
				changes. Attachments		
				contract change requests		
				3-9-11.doc and Exhibit IV		
				Wexford Health Revision		
				#2.doc.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 70 of 124 PageID #:11084

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
242				Emails from Eric Dailey to Jan Bryan, Bryan Gleckler Pat Frueh re Threshold reconciliation and phone call with Nick Little this morning. Contains handwritten notes.		
243	RTP#5_E SI 0257067	RTP#5_E SI 0257067		Email chain involving Kim Hugo, George Penny and others re Infection control nurse.		
244	RTP#5_E SI 0107873	RTP#5_E SI 0107877		Email chain involving Cindy Hobrock, Tracey Titus and Brent Gibson re Studies for QI.		
245	RTP#5_E SI 0114274	RTP#5_E SI 0114274		Email from Shawn Cates to Clara Charron, Louis Shicker, Lisa Johnson and Cindy Hobrock re Logan infirmary call light system.		
246	Subpoena to Wexford 10-10-17 Request 16 p. 550	Subpoena to Wexford 10-10-17 Request 16 p. 550	IDOC Facilities Lacking a Permanent Medical Director from 7/1/15 to 11/26/17.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 71 of 124 PageID #:11085

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
247	RTP#5_E SI 0319588	RTP#5_E SI 0319594		Email chain involving Le Chen, Jared Brunk, Sam Yi and others re Series 2016-12 Agency Acknowledgment Letter.		
248				Illinois Medical Vacancy report with ASR's as of 6/18/18 [sent directly to Dr. Puisis by Nicholas Staley on 6/18/18].		
249	RTP#5_He althcare Manageme nt_IDOC 000064	RTP#5_He althcare Manageme nt_IDOC 000069	IDOC AD 04.03.100 effective 9/1/13 re Offender Medical Records.			
250	RTP#5_He althcare Manageme nt_IDOC 000070	RTP#5_He althcare Manageme nt_IDOC 000070	IDOC AD 04.03.100 Amendment effective 3/1/14 re Offender Medical Records.			
251	RTP#5_U PDATED_ ADs & IDs_IDOC 000376	RTP#5_U PDATED_ ADs & IDs_IDOC 000383	IDOC AD 04.03.101 effective 6/1/17 re Offender Physical Examination.			
252	RTP#5_He althcare Manageme	RTP#5_He althcare Manageme	IDOC AD 04.03.102 effective 9/1/02 last			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 72 of 124 PageID #:11086

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	nt_IDOC 000079	nt_IDOC 000084	amended 1/1/12 re Dental Care for Offenders.			
253	RTP#5_U PDATED_ ADs & IDs_IDOC 000384	RTP#5_U PDATED_ ADs & IDs_IDOC 000390	IDOC AD 04.03.103 effective 6/1/17 re Offender Health Care Services.			
254	RTP#5_He althcare Manageme nt_IDOC 000093	althcare	IDOC AD 04.03.104 effective 5/1/13 re Evaluations of Offenders with Gender Identity Disorders.			
255	RTP#5_He althcare Manageme nt_IDOC 000097		IDOC AD 04.03.105 effective 10/1/14 re Chronic Illnesses.			
256	RTP#5_U PDATED_ ADs & IDs_IDOC 000390	RTP#5_U PDATED_ ADs & IDs_IDOC 000394	IDOC AD 04.03.108 effective 9/1/17 re Response to Medical Emergencies.			
257	RTP#5_He althcare Manageme nt_IDOC 000107	RTP#5_He althcare Manageme nt_IDOC 000109	IDOC AD 04.03.109 effective 9/1/02 re Living Will.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 73 of 124 PageID #:11087

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
258	RTP#5_He	RTP#5_He				
	althcare	althcare	effective 8/1/10 re Control of Medications and			
	Manageme nt_IDOC	Manageme nt_IDOC	Medical Instruments.			
	000110	000115	Wedical instruments.			
259	RTP#5_He	RTP#5_He	IDOC AD 04.03.111			
	althcare	althcare	effective 9/1/02 re Control			
	Manageme	Manageme	of Medications and			
	nt_IDOC	nt_IDOC	Medical Instruments in			
260	000116	000118	Transition Centers.			
260	RTP#5_He althcare	RTP#5_He althcare	IDOC AD 04.03.112 effective 9/1/02 re			
	Manageme	Manageme	Offender Medical and			
	nt_IDOC	nt_IDOC	Dental Services at			
	000119	000121	Transition Centers.			
261	RTP#5_He	RTP#5_He	IDOC AD 04.03.115			
	althcare	althcare	effective 2/1/14 re HIV			
	Manageme	Manageme	Disease.			
	nt_IDOC	nt_IDOC				
0.10	000122	000128				
262	RTP#5_He	RTP#5_He	IDOC AD 04.03.116			
	althcare Manageme	althcare Manageme	effective 9/1/02 re Bloodborne Pathogens.			
	nt_IDOC	nt_IDOC	Dioddoine Famogens.			
	000129	000136				
263	RTP#5_He	RTP#5_He	IDOC AD 04.03.120			
	althcare	althcare	effective 9/1/02 re			
	Manageme	Manageme				

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 74 of 124 PageID #:11088

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	nt_IDOC 000137	nt_IDOC 000140	Offender Infirmary Services.			
264	RTP#5_He althcare Manageme nt_IDOC 000141	RTP#5_He althcare Manageme nt_IDOC 000143	IDOC AD 04.03.121 effective 9/1/02 re Treatment Protocols.			
265	RTP#5_He althcare Manageme nt_IDOC 000144	althcare	IDOC AD 04.03.123 effective 9/1/12 amended 12/1/13 re Offender Contact Lenses.			
266	RTP#5_He althcare Manageme nt_IDOC 000147	RTP#5_He althcare Manageme nt_IDOC 000157	IDOC AD 04.03.125 effective 4/1/07 re Quality Improvement Program.			
267	RTP#5_He althcare Manageme nt_IDOC 000158	RTP#5_He althcare Manageme nt_IDOC 000160	IDOC AD 04.03.135 effective 9/1/02 re Employee Use of Health Care Services.			
268	RTP#5_He althcare Manageme nt_IDOC 000161	RTP#5_He althcare Manageme nt_IDOC 000163	IDOC AD 04.03.140 effective 9/1/02 re Training and Counseling on Communicable Diseases.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 75 of 124 PageID #:11089

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
269	RTP#5_He althcare	RTP#5_He althcare	IDOC AD 05.07.101 effective 11/1/05 re Adult			
	Manageme	Manageme	Process.			
	nt_IDOC	nt_IDOC	1100055.			
	000164	000168				
270	RTP#5_He	RTP#5_He	Big Muddy ID 04.03.102			
	althcare	althcare	effective 1/1/12 re Dental			
	Manageme	Manageme	Care.			
	nt_Big Muddy	nt_Big Muddy				
	000117	000122				
271	RTP#5_He	RTP#5_He	Big Muddy ID 04.03.103			
	althcare	althcare	effective 8/1/15 re Health			
	Manageme	Manageme	Care Services for			
	nt_Big	nt_Big	Offenders.			
	Muddy 000123	Muddy 000131				
272	RTP#5_U	RTP#5_U	Big Muddy ID 04.03.104			
2,2	PDATED	PDATED	effective 12/1/16 re			
	ADs &	ADs &	Evaluation of Offenders			
	IDs_Big	IDs_Big	with Gender Identification			
	Muddy	Muddy	Problems.			
	000016	000021				
273	RTP#5_He	RTP#5_He	Big Muddy ID 04.03.106			
	althcare	althcare	effective 8/1/1 re Hunger			
	Manageme nt_Big	Manageme nt_Big	Strike or Self Injurious Behavior.			
	III_DIE	III_DIE	Della v IOI.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 76 of 124 PageID #:11090

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Muddy 000138	Muddy 000143				
274	RTP#5_He althcare Manageme nt_Big Muddy 000163	RTP#5_He althcare Manageme nt_Big Muddy 000167	Big Muddy ID 04.03.108 effective 4/1/16 re Response to Medical Emergencies.			
275	RTP#5_He althcare Manageme nt_Big Muddy 000168	RTP#5_He althcare Manageme nt_Big Muddy 000175	Big Muddy ID 04.03.110 effective 4/1/15 re Control of Medications and Medical Instruments.			
276	RTP#5_He althcare Manageme nt_Big Muddy 000176	RTP#5_He althcare Manageme nt_Big Muddy 000182	Big Muddy ID 04.03.115 effective 3/1/15 re HIV Disease.			
277	RTP#5_He althcare Manageme nt_Big Muddy 000183	RTP#5_He althcare Manageme nt_Big Muddy 000188	Big Muddy ID 04.03.116 effective 10/1/09 re Bloodborne Pathogens.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 77 of 124 PageID #:11091

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
278	RTP#5_He althcare Manageme nt_Big Muddy 000189	RTP#5_He althcare Manageme nt_Big Muddy 000194	Big Muddy ID 04.03.120 effective 8/1/08 re Infirmary Services.			
279	RTP#5_He althcare Manageme nt_Big Muddy 000195	RTP#5_He althcare Manageme nt_Big Muddy 000197	Big Muddy ID 04.03.121 effective 10/1/13 re Treatment Protocols.			
280	RTP#5_He althcare Manageme nt_Big Muddy 000198	RTP#5_He althcare Manageme nt_Big Muddy 000207	Big Muddy ID 04.03.125 effective 5/1/14 re Quality Improvement Programs.			
281	RTP#5_He althcare Manageme nt_Big Muddy 000208	RTP#5_He althcare Manageme nt_Big Muddy 000209	Big Muddy ID 04.03.140 effective 10/1/11 re Training and Counseling on Communicable Diseases.			
282	RTP#5_He althcare Manageme	RTP#5_He althcare Manageme	Dixon ID 04.03.103 effective 8/1/14 re Offender Health Care Services.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 78 of 124 PageID #:11092

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	nt_Dixon 000088	nt_Dixon 000104				
283	RTP#5_He althcare Manageme nt_Dixon 000104	RTP#5_He althcare Manageme nt_Dixon 000112	Dixon ID 04.03.104 effective 6/1/13 re Evaluation of Offenders with Gender Identification Disorders.			
284	RTP#5_He althcare Manageme nt_Dixon 000113	RTP#5_He althcare Manageme nt_Dixon 000122	Dixon ID 04.03.108 effective 7/1/15 re Response to Medical Emergencies.			
285	RTP#5_He althcare Manageme nt_Dixon 000123	RTP#5_He althcare Manageme nt_Dixon 000133	Dixon ID 04.03.110 effective 9/1/11 re Control of Medications and Medical Instruments.			
286	RTP#5_He althcare Manageme nt_Dixon 000134	RTP#5_He althcare Manageme nt_Dixon 000142	Dixon ID 04.03.115 effective 3/1/14 re HIV Disease.			
287	RTP#5_He althcare Manageme nt_Dixon 000143	RTP#5_He althcare Manageme nt_Dixon 000151	Dixon ID 04.03.116 effective 10/1/13 re Bloodborne Pathogens.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 79 of 124 PageID #:11093

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
288	RTP#5_He		Dixon ID 04.03.120			
	althcare	althcare	effective 5/1/14 re			
	Manageme	Manageme	Offender Infirmary			
	nt_Dixon	nt_Dixon	Services.			
200	000152	000161	D: D 04 02 121			
289	IDOC	IDOC	Dixon ID 04.03.121			
	UPDATE	UPDATE	effective 9/1/15 re			
200	001426	001428	Treatment Protocols.			
290	IDOC	IDOC	IL River ID 04.03.102			
	UPDATE 001220	UPDATE	effective 11/1/15 re Dental Care for Offenders.			
201	IDOC	001226 IDOC	IL River ID 04.03.103			
291	UPDATE	UPDATE	effective 11/1/15 re			
	001274	001283	Offender Health Care			
	001274	001283	Services.			
292	IDOC	IDOC	IL River ID 04.03.108			
2)2	UPDATE	UPDATE	effective 6/1/15 re			
	001306	001311	Response to Medical			
	001200	001011	Emergencies.			
293	IDOC	IDOC	IL River ID 04.03.115			
	UPDATE	UPDATE	effective 4/1/14 re HIV			
	001356	001363	Disease.			
294	IDOC	IDOC	IL River ID 04.03.120			
	UPDATE	UPDATE	effective 11/1/15 re			
	001415	001422	Infirmary Services.			
295	IDOC	IDOC	IL River ID 04.03.125			
	UPDATE	UPDATE	effective 5/1/13 re Quality			
	001435	001445	Improvement Program.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 80 of 124 PageID #:11094

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
296	RTP#5_U PDATED_	RTP#5_U PDATED_	IL River ID 04.03.110 effective 7/1/17 re Control			
	ADs &	ADs &	of Medications and			
	IDs_IRCC	IDs_IRCC	Medical Instruments.			
	000081	000089	Treated High afficies.			
297	RTP#5_U	RTP#5_U	IL River ID 04.03.116			
	PDATED_	PDATED_	effective 10/1/12 re			
	ADs &	ADs &	Bloodborne Pathogens.			
	IDs_IRCC	IDs_IRCC				
	000100	000109				
298	RTP#5_U	RTP#5_U	IL River ID 04.03.121			
	PDATED_	PDATED_	effective 10/1/02 re			
	ADs &	ADs &	Treatment Protocols.			
	IDs_IRCC 000145	IDs_IRCC 000150				
299	RTP#5_U	RTP#5_U	IL River ID 04.03.140			
299	PDATED_	PDATED_	effective 10/1/02 re			
	ADs &	ADs &	Training and Counseling			
	IDs_IRCC	IDs_IRCC	on Communicable			
	000164	000168	Diseases.			
300	IDOC	IDOC	Lawrence ID 04.03.103			
	UPDATE	UPDATE	effective 8/1/14 re			
	001074	001081	Offender Health Care			
			Services.			
301	IDOC	IDOC	Lawrence ID 04.03.108			
	UPDATE	UPDATE	effective 6/1/15 re			
	001096	001102	Response to Medical			
			Emergencies.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 81 of 124 PageID #:11095

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
302	IDOC UPDATE 001118	IDOC UPDATE 001123	Lawrence ID 04.03.115 effective 3/1/14 re HIV Disease.			
303	IDOC UPDATE 001132	IDOC UPDATE 001138	Lawrence ID 04.03.116 effective 4/1/13 re Bloodborne Pathogens.			
304	IDOC UPDATE 001157	IDOC UPDATE 001161	Lawrence ID 04.03.121 effective 10/1/15 re Treatment Protocols.			
305	RTP#5_U PDATED_ ADs & IDs_Logan 000008	RTP#5_U PDATED_ ADs & IDs_Logan 000015	Logan ID 04.03.103 effective 7/13/17 re Health Care Services for Offenders.			
306	IDOC UPDATE 001086	IDOC UPDATE 001091	Logan ID 04.03.104 effective 5/15/13 re Evaluations of Offenders with Gender Identification Problems.			
307	RTP#5_U PDATED_ ADs & IDs_Logan 000016	RTP#5_U PDATED_ ADs & IDs_Logan 000022	Logan ID 04.03.108 effective 9/5/17 re Response to Medical Emergencies.			
308	RTP#5_He althcare Manageme	RTP#5_He althcare Manageme	Logan ID 04.03.110 effective 11/10/11 re Control of Medications /			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 82 of 124 PageID #:11096

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	nt_Logan 000053	nt_Logan 000059	Syringes / Needles / Medical Instruments.			
309	RTP#5_He althcare Manageme nt_Logan 000060	RTP#5_He althcare Manageme nt_Logan 000066	Logan ID 04.03.115 effective 8/15/11 re HIV Disease.			
310	RTP#5_He althcare Manageme nt_Logan 000067	RTP#5_He althcare Manageme nt_Logan 000073	Logan ID 04.03.116 effective 8/15/10 re Bloodborne Pathogens.			
311	RTP#5_He althcare Manageme nt_Logan 000074	RTP#5_He althcare Manageme nt_Logan 000078	Logan ID 04.03.120 effective 3/9/16 re Offender Infirmary Services.			
312	RTP#5_He althcare Manageme nt_Logan 000079	RTP#5_He althcare Manageme nt_Logan 000081	Logan ID 04.03.121 effective 9/9/09 re Treatment Protocols.			
313	RTP#5_U PDATED_ ADs & IDs_Mena rd 000001	RTP#5_U PDATED_ ADs & IDs_Mena rd 000013	Menard ID 04.03.103 effective 5/1/16 re Offender Health Care Services.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 83 of 124 PageID #:11097

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
314	RTP#5_U PDATED_	RTP#5_U PDATED_	Menard ID 04.03.104 effective 5/1/13 re			
	ADs &	ADs &	Evaluations of Offenders			
	IDs_Mena	IDs_Mena	with Gender Identification			
	rd 000014	rd 000019	Disorders.			
315	RTP#5_U	RTP#5_U	Menard ID 04.03.108			
	PDATED_	PDATED_	effective 4/1/17 re			
	ADs &	ADs &	Response to Medical			
	IDs_Mena rd 000029	IDs_Mena	Emergencies.			
316	RTP#5_U	rd 000037 RTP#5_U	Menard ID 04.03.110			
310	PDATED_	PDATED_	effective 4/1/17 re Control			
	ADs &	ADs &	of Medications and			
	IDs_Mena	IDs_Mena	Medical Instruments.			
	rd 000038	rd 000055				
317	RTP#5_U	RTP#5_U	Menard ID 04.03.115			
	PDATED_ ADs &	PDATED_ ADs &	effective 3/1/14 re HIV Disease.			
	IDs_Mena	IDs_Mena	Disease.			
	rd 000056	rd 000063				
318	RTP#5_U	RTP#5_U	Menard ID 04.03.116			
	PDATED_	PDATED_	effective 9/1/15 re			
	ADs &	ADs &	Bloodborne Pathogens.			
	IDs_Mena rd 000064	IDs_Mena				
319	RTP#5_U	rd 000073 RTP#5_U	Menard ID 04.03.120			
319	PDATED_	PDATED	effective 5/1/15 re			
	ADs &	ADs &	011000110 0/1/10 10			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 84 of 124 PageID #:11098

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	IDs_Mena rd 000074	IDs_Mena rd 000081	Offender Infirmary Service.			
320	RTP#5_U PDATED_ ADs & IDs_Mena rd 000082	RTP#5_U PDATED_ ADs & IDs_Mena rd 000084	Menard ID 04.03.121 effective 10/1/14 re Treatment Protocols.			
321	RTP#5_U PDATED_ ADs & IDs_NRC 000009	RTP#5_U PDATED_ ADs & IDs_NRC 000018	Stateville ID 04.03.103K3 effective 6/1/17 re Offender Health Care Services.			
322	RTP#5_U PDATED_ ADs & IDs_NRC 000027	RTP#5_U PDATED_ ADs & IDs_NRC 000030	Stateville ID 04.03.104K3 effective 2/1/17 re Evaluation of Offenders with Gender Identification Problems.			
323	RTP#5_U PDATED_ ADs & IDs_NRC 000035	RTP#5_U PDATED_ ADs & IDs_NRC 000038	Stateville ID 04.03.108 effective 9/1/17 re Response to Medical Emergencies.			
324	RTP#5_U PDATED_ ADs & IDs_NRC 000051	RTP#5_U PDATED_ ADs & IDs_NRC 000058	Stateville ID 04.03.110 effective 6/1/17 re Control of Medications and Medical Instruments.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 85 of 124 PageID #:11099

BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
RTP#5_U	RTP#5_U	Stateville ID 04.03.115			
_	_				
IDs_NRC 000075	IDs_NRC 000082	Disease.			
RTP#5_U	RTP#5_U	Stateville ID 04.03.116			
PDATED_	PDATED_	effective 11/1/16 re			
ADs &	ADs &	Bloodborne Pathogens.			
IDs_NRC	IDs_NRC				
_	_				
		· · · · · · · · · · · · · · · · · · ·			
		Scrvices.			
		Stateville ID 04.03.121K3			
PDATED_	PDATED_	effective 4/1/17 re			
ADs &	ADs &	Treatment Protocols.			
IDs_NRC	IDs_NRC				
		•			
_	_	Emergencies.			
		Pontiac ID 04 03 110			
ADs &	ADs &				
	RTP#5_U PDATED_ ADs & IDs_NRC 000075 RTP#5_U PDATED_ ADs & IDs_NRC 000095 RTP#5_U PDATED_ ADs & IDs_NRC 000104 RTP#5_U PDATED_ ADs & IDs_NRC 000115 RTP#5_U PDATED_ ADs & IDs_POntia c 000014 RTP#5_U PDATED_	RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000075 000082 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000095 000100 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000095 000100 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000104 000106 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000104 000106 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000104 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000115 000118 RTP#5_U RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000115 000118 RTP#5_U RTP#5_U PDATED_ ADs & IDs_NRC 000118 RTP#5_U RTP#5_U PDATED_ ADs & IDs_Pontia c 000018 RTP#5_U RTP#5_U PDATED_ ADS & IDs_Pontia c 000018 RTP#5_U RTP#5_U PDATED_	RTP#5_U	RTP#5_U PDATED_ ADs & ADs & IDs_NRC 000075 000082 ETP#5_U PDATED_ ADs & ADs & Bloodborne Pathogens. Ds_NRC 000095 000100 ETP#5_U PDATED_ ADs & ADs & IDs_NRC 000095 000100 ETP#5_U PDATED_ ADs & IDs_NRC 000104 ETP#5_U PDATED_ ADs & ADs & IDs_NRC 000104 ETP#5_U PDATED_ ADs & IDs_NRC 000106 ETP#5_U PDATED_ ADs & ADs & IDs_NRC 000106 ETP#5_U PDATED_ ADs & ADs & IDs_NRC 000115 ETP#5_U PDATED_ ADs & ADs & IDs_NRC 000118 ETP#5_U PDATED_ ADs & ADs & IDs_Pontia IDs_Pontia C 000014 ETP#5_U PDATED_ ETP#5_U POntiac ID 04.03.110 ETP#5_U PONTIAC ID 04.03.110 ETP#5_U PDATED_ ETP#5_U POntiac ID 04.03.110 ETP#5_U	RTP#5_U

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 86 of 124 PageID #:11100

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	IDs_Pontia c 000019	IDs_Pontia c 000034	of Medications and Medical Instruments.			
331	RTP#5_U PDATED_ ADs & IDs_Pontia c 000035	RTP#5_U PDATED_ ADs & IDs_Pontia c 000041	Pontiac ID 04.03.115 effective 3/1/14 re HIV Disease.			
332	RTP#5_U PDATED_ ADs & IDs_Pontia c 000042	RTP#5_U PDATED_ ADs & IDs_Pontia c 000050	Pontiac ID 04.03.116 effective 3/1/14 re Bloodborne Pathogens.			
333	RTP#5_U PDATED_ ADs & IDs_Pontia c 000051	RTP#5_U PDATED_ ADs & IDs_Pontia c 000055	Pontiac ID 04.03.120 effective 3/1/14 re Offender Infirmary Services.			
334	RTP#5_U PDATED_ ADs & IDs_Pontia c 000056	RTP#5_U PDATED_ ADs &	Pontiac ID 04.03.121 effective 3/1/14 re Treatment Protocols.			
335	RTP#5_U PDATED_ ADs & IDs_Pontia c 000059	RTP#5_U PDATED_ ADs &	Pontiac ID 04.03.103 effective 7/1/17 re Offender Health Care Services.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 87 of 124 PageID #:11101

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
336	RTP#5_U PDATED_	RTP#5_U PDATED_	Hill ID 04.03.108 effective 10/1/17 re			
	ADs &	ADs &	Response to Medical			
	IDs_Hill	IDs_Hill	Emergencies.			
	000011	000018	Emergeneres.			
337	RTP#5_U	RTP#5_U	Hill ID 04.03.121			
	PDATED_	PDATED_	effective 3/1/12 re			
	ADs &	ADs &	Treatment Protocols.			
	IDs_Hill	IDs_Hill				
	000019	000021				
338	RTP#5_U	RTP#5_U		Big Muddy signed		
	PDATED_ Wexford	PDATED_ Wexford		reconciliations FY16-FY18.		
	Recon_Big	Recon_Big		F116.		
	Muddy	Muddy				
	000022	000041				
339	RTP#5_U	RTP#5_U		Centralia signed		
	PDATED_	PDATED_		reconciliations FY16-		
	Wexford	Wexford		FY18.		
	Recon_Ce	Recon_Ce				
	ntralia	ntralia				
2.10	000001	000012				
340	RTP#5_U	RTP#5_U		Decatur signed reconciliations FY16-		
	PDATED_ Wexford	PDATED_ Wexford		FY18.		
	Recon_De	Recon_De		1 110.		
	catur	catur				
	000001	000012				

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 88 of 124 PageID #:11102

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
341	RTP#5_U PDATED_ Wexford Recon_Di xon 000018	RTP#5_U PDATED_ Wexford Recon_Di xon 000024		Dixon signed reconciliations FY16-FY17.		
342	RTP#5_U PDATED_ Wexford Recon_Eas t Moline 000001	RTP#5_U PDATED_ Wexford Recon_Eas t Moline 000013		E. Moline signed reconciliations FY16-FY18.		
343	RTP#5_U PDATED_ Wexford Recon_Gr aham 000001	RTP#5_U PDATED_ Wexford Recon_Gr aham 000012		Graham signed reconciliations FY16-FY18.		
344	RTP#5_U PDATED_ Wexford Recon_Hil 1 000015	RTP#5_U PDATED_ Wexford Recon_Hil 1 000023		Hill signed reconciliations FY16-FY17.		
345	RTP#5_U PDATED_ Wexford Recon_IR	RTP#5_U PDATED_ Wexford Recon_IR		IL River signed reconciliations FY16-FY18.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 89 of 124 PageID #:11103

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	CC 000016	CC 000026				
346	RTP#5_U PDATED_ Wexford Recon_Jac ksonville 000001	RTP#5_U PDATED_ Wexford Recon_Jac ksonville 000012		Jacksonville signed reconciliations FY16-FY18.		
347	RTP#5_U PDATED_ Wexford Recon_Ke wanee 000001	RTP#5_U PDATED_ Wexford Recon_Ke wanee 000003		Kewanee signed reconciliations FY18.		
348	RTP#5_U PDATED_ Wexford Recon_La wrence 000001	RTP#5_U PDATED_ Wexford Recon_La wrence 000012		Lawrence signed reconciliations FY16-FY18.		
349	RTP#5_U PDATED_ Wexford Recon_Lin coln 000001	RTP#5_U PDATED_ Wexford Recon_Lin coln 000012		Lincoln signed reconciliations FY16-FY18.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 90 of 124 PageID #:11104

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
350	RTP#5_U PDATED_ Wexford Recon_Lo gan 000017	RTP#5_U PDATED_ Wexford Recon_Lo gan 000027		Logan signed reconciliations FY16-FY18.		
351	RTP#5_U PDATED_ Wexford Recon_Me nard 000018	RTP#5_U PDATED_ Wexford Recon_Me nard 000027		Menard signed reconciliations FY16-FY18.		
352	RTP#5_U PDATED_ Wexford Recon_Pin ckneyville 000001	RTP#5_U PDATED_ Wexford Recon_Pin ckneyville 000012		Pinckneyville signed reconciliations FY16-FY18.		
353	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000027	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000053		Pontiac signed reconciliations FY16-FY18.		
354	RTP#5_U PDATED_ Wexford Recon_Ro	RTP#5_U PDATED_ Wexford Recon_Ro		Robinson signed reconciliations FY16-FY17.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 91 of 124 PageID #:11105

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	binson 000001	binson 000009				
355	RTP#5_U PDATED_ Wexford Recon_Sh awnee 000001	RTP#5_U PDATED_ Wexford Recon_Sh awnee 000012		Shawnee signed reconciliations FY16-FY18.		
356	RTP#5_U PDATED_ Wexford Recon_Sh eridan 000001	RTP#5_U PDATED_ Wexford Recon_Sh eridan 000013		Sheridan signed reconciliations FY16-FY18.		
357	RTP#5_U PDATED_ Wexford Recon_Sta teville 000005	RTP#5_U PDATED_ Wexford Recon_Sta teville 000028		Stateville signed reconciliations FY16-FY18.		
358	RTP#5_U PDATED_ Wexford Recon_S WICC 000001	RTP#5_U PDATED_ Wexford Recon_S WICC 000012		SW Illinois signed reconciliations FY16-FY18.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 92 of 124 PageID #:11106

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
359	RTP#5_U PDATED_ Wexford Recon_Ta ylorville 000001	RTP#5_U PDATED_ Wexford Recon_Ta ylorville 000012		Taylorville signed reconciliations FY16-FY18.		
360	RTP#5_U PDATED_ Wexford Recon_Va ndalia 000001	RTP#5_U PDATED_ Wexford Recon_Va ndalia 000013		Vandalia signed reconciliations FY16-FY18.		
361	RTP#5_U PDATED_ Wexford Recon_Vie nna 000001	RTP#5_U PDATED_ Wexford Recon_Vie nna 000007		Vienna signed reconciliations FY16-FY18.		
362	RTP#5_U PDATED_ Wexford Recon_We stern 000001	RTP#5_U PDATED_ Wexford Recon_We stern 000010		Western signed reconciliations FY16-FY18.		
363	Subpoena to Wexford 10-17-17	Subpoena to Wexford 10-17-17		Illinois - Fill Rate History spreadsheets Jan-May 2018.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 93 of 124 PageID #:11107

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Request 15 p. 11076	Request 15 p. 11080				
364	Subpoena to Wexford 10-17-17 Request 11 p. 11269	Subpoena to Wexford 10-17-17 Request 11 p. 11271		Mortality worksheet of Mitchell.		
365	Subpoena to Wexford 10-17-17 Request 11 p. 11272	Subpoena to Wexford 10-17-17 Request 11 p. 11275		Mortality worksheet of Eisenberg.		
366	Subpoena to Wexford 10-17-17 Request 11 p. 11267	Subpoena to Wexford 10-17-17 Request 11 p. 11268		Mortality worksheet of Varela.		
367	Subpoena to Wexford 10-17-17 Request 11 p. 11266	Subpoena to Wexford 10-17-17 Request 11 p. 11266		Morbidity survey report of Varela.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 94 of 124 PageID #:11108

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
368	Subpoena to Wexford 10-17-17 Request 11 p. 11276	Subpoena to Wexford 10-17-17 Request 11 p. 11278		Mortality worksheet and mobidity survey report of Baggett.		
369	Subpoena to Wexford 10-17-17 Request 11 p. 11279	Subpoena to Wexford 10-17-17 Request 11 p. 11284		Mortality worksheet and mobidity survey report of Washington.		
370	Subpoena to Wexford 10-17-17 Request 5 p. 11556	Subpoena to Wexford 10-17-17 Request 5 p. 11562		Discipline report for Dr. Obaisi.		
371	Subpoena to Wexford 10-17-17 Request 5 p. 11573	Subpoena to Wexford 10-17-17 Request 5 p. 11576		Discipline report for Dr. Sood.		
372	Subpoena to Wexford 10-17-17	Subpoena to Wexford 10-17-17		Discipline report for Dr. Trost		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 95 of 124 PageID #:11109

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Request 5 p. 11577	Request 5 p. 11584				
373	Subpoena to Wexford 10-17-17 Request 13 p. 12274	Subpoena to Wexford 10-17-17 Request 13 p. 12305		Audited Financial Statements (Proposal Exhibit #4 to Wexford bid).		
374	Subpoena to Wexford 10-17-17 Request 29 p. 12306	Subpoena to Wexford 10-17-17 Request 29 p. 12309		Email chain involving Trey Childress, Nick Little, Darius Holmes, Shannis Stock-Jones and others re IDOC Psychiatric Staffing Needs.	401 and 403: Defendants object to this document as not relevant because it does make not any issue that is of consequence to the litigation in this case more probable or less probable than without it.	
375	DALEY00 0001	DALEY00 1572	Packet 2 - Corizon Health Pricing Proposal.		,	
376	Subpoena to Wexford 10-17-17 Request 21 p. 9094	Subpoena to Wexford 10-17-17 Request 21 p. 9095	222000	PDF titled "Medical backlogs 1/8/18."		
377	Subpoena to Wexford	Subpoena to Wexford		PDF titled "Medical backlogs 3/12/18."		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 96 of 124 PageID #:11110

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	10-17-17 Request 21 p. 9096	10-17-17 Request 21 p. 9097				
378	Subpoena to Wexford 10-17-17 Request 21 p. 9099	Subpoena to Wexford 10-17-17 Request 21 p. 9100		PDF titled "Medical backlogs 4/9/18."		
379	Subpoena to Wexford 10-17-17 Request 21 p. 9102	Subpoena to Wexford 10-17-17 Request 21 p. 9103		PDF titled "Medical backlogs 5/14/18."		
380	Subpoena to Wexford 10-17-17 Request 21 p. 9095	Subpoena to Wexford 10-17-17 Request 21 p. 9095		PDF titled "Staffing vacancies 1/8/18."		
381	Subpoena to Wexford 10-17-17 Request 21 p. 9098	Subpoena to Wexford 10-17-17 Request 21 p. 9098		PDF titled "Staffing vacancies 3/12/17."		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 97 of 124 PageID #:11111

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
382	Subpoena to Wexford 10-17-17 Request 21 p. 9101	Subpoena to Wexford 10-17-17 Request 21 p. 9101		PDF titled "Staffing vacancies 4/9/18."		
383	Subpoena to Wexford 10-17-17 Request 21 p. 9103	Subpoena to Wexford 10-17-17 Request 21 p. 9103		PDF titled "Staffing vacancies 5/14/18."		
384	RTP#5_U PDATED_ Backlogs & Vacancies 000020	RTP#5_U PDATED_ Backlogs & Vacancies 000035		Backlog data tracker 2016-2017.		
385	RTP#5_U PDATED_ Wexford Docs 000001	RTP#5_U PDATED_ Wexford Docs 000008		PDF titled "Lippert Monthly Call Notes" showing backlogs and vacancies.		
386	RTP#5_U PDATED_ Backlogs &	RTP#5_U PDATED_ Backlogs &		Staffing vacancies tracker 2016-2017.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 98 of 124 PageID #:11112

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Vacancies 000036	Vacancies 000053				
387	RTP#5_U PDATED_ Wexford Recon_Big Muddy 000021	RTP#5_U PDATED_ Wexford Recon_Big Muddy 000021		Big Muddy FY18 reconciliation update.		
388	RTP#5_U PDATED_ Wexford Recon_Di xon 000016	RTP#5_U PDATED_ Wexford Recon_Di xon 000017		Dixon FY18 reconciliation update.		
389	RTP#5_U PDATED_ Wexford Recon_IR CC 000015	RTP#5_U PDATED_ Wexford Recon_IR CC 000015		IL River FY18 reconciliation update.		
390	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000026	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000026		Pontiac FY18 reconciliation update.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 99 of 124 PageID #:11113

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
391	RTP#5_U PDATED_ Wexford Recon_Sta teville 000003	RTP#5_U PDATED_ Wexford Recon_Sta teville 000004		Stateville FY18 reconciliation update.		
392	RTP#5_U PDATED_ Wexford Recon_Hil 1 000014	RTP#5_U PDATED_ Wexford Recon_Hil 1 000014		Hill FY18 reconciliation update.		
393	RTP#5_U PDATED_ Wexford Recon_Lo gan 000016	RTP#5_U PDATED_ Wexford Recon_Lo gan 000016		Logan FY18 reconciliation update.		
394	RTP#5_U PDATED_ Wexford Recon_Me nard 000017	RTP#5_U PDATED_ Wexford Recon_Me nard 000017		Menard FY18 reconciliation update.		
395	RTP#5_U PDATED_ Backlogs &	RTP#5_U PDATED_ Backlogs &		Staffing vacancies tracker 2016-2018.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 100 of 124 PageID #:11114

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Vacancies 000001	Vacancies 000019				
396	RTP#5_U PDATED_ Wexford Recon_Big Muddy 000001	RTP#5_U PDATED_ Wexford Recon_Big Muddy 000020		Big Muddy signed reconciliations FY14-FY16.		
397	RTP#5_U PDATED_ Wexford Recon_Di xon 000001	RTP#5_U PDATED_ Wexford Recon_Di xon 000015		Dixon signed reconciliations FY14-FY16.		
398	RTP#5_U PDATED_ Wexford Recon_Hil 1 000001	RTP#5_U PDATED_ Wexford Recon_Hil 1 000013		Hill signed reconciliations FY14-FY16.		
399	RTP#5_U PDATED_ Wexford Recon_IR CC 000001	RTP#5_U PDATED_ Wexford Recon_IR CC 000014		IL River signed reconciliations FY14-FY16.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 101 of 124 PageID #:11115

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
400	RTP#5_U PDATED_ Wexford Recon_Lo gan 000001	RTP#5_U PDATED_ Wexford Recon_Lo gan 000015		Logan signed reconciliations FY14-FY16.		
401	RTP#5_U PDATED_ Wexford Recon_Me nard 000001	RTP#5_U PDATED_ Wexford Recon_Me nard 000016		Menard signed reconciliations FY14-FY16.		
402	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000001	RTP#5_U PDATED_ Wexford Recon_Po ntiac 000025		Pontiac signed reconciliations FY14-FY16.		
403	RTP#5_U PDATED_ Wexford Recon_Sta teville 000001	RTP#5_U PDATED_ Wexford Recon_Sta teville 000002		Stateville signed reconciliation 1st quarter FY15.		
404	RTP#5_U PDATED_ Equipment Upgrades_	RTP#5_U PDATED_		Adjusted Service Requested (ASRs) for equipment at Stateville/NRC.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 102 of 124 PageID #:11116

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	NRC 000001	NRC 000011				
405	RTP#5_U PDATED_ Equipment Upgrades 000065	RTP#5_U PDATED_ Equipment Upgrades 000066		Declaration of Michelle Grimsley re upgrade equipment and record retention at Logan.		
406	RTP#5_U PDATED_ Wexford Monitorin g_NRC 000001	RTP#5_U PDATED_ Wexford Monitorin g_NRC 000002		Declaration of Mary Ellen Grennan re contract monitoring reports at NRC.		
407	RTP#5_U PDATED_ Budget_N RC 000001	RTP#5_U PDATED_ Budget_N RC 000001		Declaration of Ken Harris re budget analysis records at NRC.		
408	RTP#5_U PDATED_ Equipment Upgrades_ IRCC 000001	RTP#5_U PDATED_ Equipment Upgrades_ IRCC 000021		Adjusted Service Requested (ASRs) for equipment at IL River.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 103 of 124 PageID #:11117

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
409	RTP#5_U PDATED_ Budget_IR CC 000001	RTP#5_U PDATED_ Budget_IR CC 000001		Declaration of John E. Smith re budget information at IL River.		
410	RTP#5_U PDATED_ OHS QM Reports 000006	RTP#5_U PDATED_ OHS QM Reports 000013	Office of Health Services Meeting Minutes 3/3/16.			
411	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 581	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 608		PDFs of spreadsheets for each facility titled "Bi- weekly vacancy backlog report blank."		
412	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 623	Subpoena to Wexford 10-10-17 Request 21 & 44 p. 636		Staffing vacancy spreadsheets dated 10/17/16 to 12/11/17.		
413	Subpoena to Wexford 10-17-17	Subpoena to Wexford 10-17-17		CVs of doctors and dentists (according to PDF filenames, some of these doctors and dentists are		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 104 of 124 PageID #:11118

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Request 3 p. 637	Request 3 p. 857		from IL River, Pinckneyville, Western IL and Pontiac facilities).		
414	RTP#5_U PDATED_ Equipment Upgrades 000059	RTP#5_U PDATED_ Equipment Upgrades 000060		Declaration of of Kyle (Lynn) Robinson re equipment at Big Muddy.		
415	RTP#5_U PDATED_ Equipment Upgrades 000061	RTP#5_U PDATED_ Equipment Upgrades 000061		Declaration of Amber Allen re equipment at Dixon.		
416	RTP#5_U PDATED_ Equipment Upgrades 000062	RTP#5_U PDATED_ Equipment Upgrades 000064		Invoices for equipment at Pontiac.		
417	Subpoena to Wexford 10-10-17 Request 1 p. 520	Subpoena to Wexford 10-10-17 Request 1 p. 548	Medical and dental staff employed at IDOC facilities from 7/1/15 to 11/22/17.			
418	Subpoena to Wexford	Subpoena to Wexford		Email chain involving Cheri Laurent, Gladyse		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 105 of 124 PageID #:11119

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	10-10-17 Response 28 p. 496	10-10-17 Response 28 p. 498		Taylor, Catherine Larry and others re PEARL.		
419	RTP#5_U PDATED_ Equipment Upgrades 000001	RTP#5_U PDATED_ Equipment Upgrades 000001		Health care equipment upgrade list since June 2016 (facility unknown).		
420	RTP#5_U PDATED_ Equipment Upgrades 000001	RTP#5_U PDATED_ Equipment Upgrades 000010		Adjusted Service Requested (ASRs) for equipment at Stateville/NRC.		
421	RTP#5_U PDATED_ Equipment Upgrades 000011	RTP#5_U PDATED_ Equipment Upgrades 000011		PDF titled "Budget analysis & reconciliation for June 2016 to present."		
422	RTP#5_U PDATED_ Equipment Upgrades 000012	RTP#5_U PDATED_ Equipment Upgrades 000013		Adjusted Service Requested (ASRs) for dental equipment at Dixon.		
423	RTP#5_U PDATED_ Equipment Upgrades 000014	RTP#5_U PDATED_ Equipment Upgrades 000016		Adjusted Service Requested (ASRs) for equipment at Big Muddy.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 106 of 124 PageID #:11120

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
424	RTP#5_U	RTP#5_U		Adjusted Service		
	PDATED_	PDATED_		Requested (ASRs) and		
	Equipment	Equipment		invoices for equipment at		
	Upgrades 000017	Upgrades 000020		Pontiac.		
425	RTP#5_U	RTP#5_U		Adjusted Service		
423	PDATED_	PDATED_		Requested (ASRs) for		
	Equipment	Equipment		optical equipment at		
	Upgrades	Upgrades		Dixon and equipment at		
	000021	000024		Logan.		
426	RTP#5_U	RTP#5_U		Adjusted Service		
	PDATED_	PDATED_		Requested (ASRs) and		
	Equipment	Equipment		invoices for equipment at		
	Upgrades	Upgrades		Pontiac.		
	000025	000056				
427	RTP#5_U	RTP#5_U		Adjusted Service		
	PDATED_	PDATED_		Requested (ASRs) for		
	Equipment	Equipment		optical equipment at		
	Upgrades 000057	Upgrades 000057		Dixon.		
428	000037	000037	Illinois Commission on		802: Defendants object	
720			Criminal Justice and		based on hearsay.	
			Sentencing Reform - The		onson on nonionj.	
			Prison Letter Report,			
			Adler University.			

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 107 of 124 PageID #:11121

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
429	RTP#5_U PDATED_ Equipment Upgrades_ IDOC 000001	RTP#5_U PDATED_ Equipment Upgrades_ IDOC 000092		Spreadsheet titled "ASR Log Redacted."		
430	RTP#5_E SI 0578274	RTP#5_E SI 0578300		Email from Jared Brunk to Jennifer Lokaitis re FY16 Budget Summary Workbook. Attachment FY16 summary workbook.xlsx.		
431	RTP#5_E SI 0294034	RTP#5_E SI 0294084		Email from Gladyse Taylor to several re Comprehensive Healthcare QA 3/27/17. Attachment Health Care RFP Questions/Answers 2017.		
432	RFP Materials 000046	RFP Materials 000046		Illinois - Fill Rate History - Staffing Vacancies and Fill Rates May 2014-Feb 2017.		
433	Subpoena to Wexford 10-10-17	Subpoena to Wexford 10-10-17		Discipline report for Ruth Brown.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 108 of 124 PageID #:11122

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
	Request 5 p. 11534	Request 5 p. 11539				
434	Subpoena to Wexford 10-10-17 Request 5 p. 11549	Subpoena to Wexford 10-10-17 Request 5 p. 11545		Discipline report for Dr. James.		
435	RTP#5_E SI 0473211	RTP#5_E SI 0473212		Email from Marna Ross to Louis Shicker re Questions and FYIs.		
436	RTP#5_E SI 0394008	RTP#5_E SI 0394009		Email chain involving Laura MacQueen, Robin Rose and others re CQI.		
437				Email chain involving Louis Shicker, Stephen Ritz and others re Offender Bahler, Daniel R27604.		
438	RTP#5_E SI 0048808	RTP#5_E SI 0048810		Email chain involving Nigel Vinyard, George Penny, Kim Hugo, Steven Meeks, Cindy Hobrock and others re C-PAPs / Medical Equipment.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 109 of 124 PageID #:11123

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
439	RTP#5_E SI 0048806	RTP#5_E SI 0048807		Email chain involving George Penny, Cindy Hobrock, Steven Meeks and others re C-PAPs / Medical Equipment.		
440	RTP#5_E SI 0049806	RTP#5_E SI 0049809		Email from Michael Dempsey to Steven Meeks and Kim Hugo re UIC College of Nursing Meeting Minutes 1/30/17. Attachment UIC College of Nursing Meeting Minutes 1/30/17.		
441	RTP#5_E SI 0049968	RTP#5_E SI 0049972		Email chain involving Jared Brunk, Louis Shicker, Cindy Hobrock, Natalie Northern and others re HELP!		
442	RTP#5_E SI 0052220	RTP#5_E SI 0052223		Email chain involving Jared Brunk, David Gomez, Louis Shicker, Tina Jepsen and others re East Moline and Wexford.		
443	RTP#5_E SI 0050820	RTP#5_E SI 0050822		Email chain involving Jason Garnett, Louis Shicker, Mike Atchison and others re Hill CC Medical Back log.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 110 of 124 PageID #:11124

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
444	RTP#5_E SI 0085489	RTP#5_E SI 0085490		Email from Louis Shicker to Gladyse Taylor, Bryan Gleckler and others re Medical Director Vacancies.		
445	RTP#5_E SI 0095486	RTP#5_E SI 0095486		Email chain involving Steven Meeks, Arthur Funk and others re Dr. James.		
446	RTP#5_E SI 0095599	RTP#5_E SI 0095600		Email chain between Steven Meeks and Lisa Prather re Diagnosis.		
447			2017 Request for Proposal.			
448	RTP#5_E SI 0098877	RTP#5_E SI 0098878		Email chain involving Lisa Prather, Steven Meeks and others re Chronic Clinic Data.		
449	RTP#5_E SI 0118711	RTP#5_E SI 0118717		Email chain involving Lisa Prather, Mary Johnson and Louis Shicker re Y90 radiation.		
450	RTP#5_E SI 0127411	RTP#5_E SI 0127412		Email chain between Marna Ross and Doug Mote re Adrian Bryant / NRC medical records.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 111 of 124 PageID #:11125

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
451	RTP#5_E SI 0101731	RTP#5_E SI 0101735		Email chain involving Steven Meeks, Lisa Bishop, Cindy Hobrock, Juliana Chan and others re Dodd K03306.		
452	RTP#5_E SI 0101921	RTP#5_E SI 0101923		Email chain involving Steven Meeks, Gail Walls, Lisa Prather, Kim Hugo and others re Donzell Harris.		
453	RTP#5_E SI 0042897	RTP#5_E SI 0042898		Email chain between Becky Sudbrink and Louis Shicker re lack of practitioner coverage.		
454	RTP#5_E SI 0163285	RTP#5_E SI 0163288		Email chain involving Steven Meeks, Michael Dempsey, Lisa Prather and others re ASR on beds.		
455	Response to Eleventh Motion to Compel 000390	Response to Eleventh Motion to Compel 000393		Quarterly Reconciliation Reports for 2Q and 3Q for Stateville and NRC.		
456	RTP#5_E SI 0464760	RTP#5_E SI 0464764		Email chain involving Gail Walls, Kim Hugo, Lisa Prather, Steven		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 112 of 124 PageID #:11126

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Meeks and Michael Dempsey re Menard HCU - Admin.		
457	RTP#5_E SI 0183659	RTP#5_E SI 0183660		Email from Timothy Chamberlain to several re Death summary Caradine (R56618). Attachment 11/21/16 Death Summary of Caradine.		
458	RTP#5_E SI 0188147	RTP#5_E SI 0188184		Email from Louis Shicker to Kim Hugo, Cindy Hobrock, Lisa Prather and Joseph Ssenfuma re For your files. Attachments several death reviews and mortality conference reports.		
459	RTP#5_E SI 0147069	RTP#5_E SI 0147092		Email from Shellie Yeates to Joseph Ssenfuma re Stateville PBR FY16. Attachment Office of Performance Based Standards FY16 Performance Based Review Report for Stateville and NRC, 10/5/15 - 10/9/15.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 113 of 124 PageID #:11127

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
460	RTP#5_E SI 0290095	RTP#5_E SI 0290097		Email chain involving Kim Hugo, Joseph Ssenfuma, Mike Atchison and others re Stateville HCU.		
461	RTP#5_E SI 0285137	RTP#5_E SI 0285139		Email chain involving Louis Shicker, Cheri Laurent, Roderick Matticks, Cindy Hobrock and others re Dr. Kayira.		
462	RTP#5_E SI 0173531	RTP#5_E SI 0173534		Email chain involving Dede Short, Michael Dempsey, Sandra Funk, Michael Melvin and others re A10465.		
463	RTP#5_E SI 0365710	RTP#5_E SI 0365712		Email chain involving Steven Meeks, Jackie Mitchell, Michael Dempsey and others re CMT assistance for IYC- Joliet.		
464	RTP#5_E SI 0185217	RTP#5_E SI 0185219		Email chain involving Cindy Hobrock, Kimberly Smith, Lisa Mincy and others re MD issues.		
465	RTP#5_E SI 0052467	RTP#5_E SI 0052469		Email chain involving Jared Brunk, LaShonda Hunt, Christine Brown		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 114 of 124 PageID #:11128

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				and others re Medical director hours.		
466	RTP#5_E SI 0369899	RTP#5_E SI 0369901		Email chain involving Michael Dempsey, Kim Hugo, Louis Shicker, Phil Martin and others re		
467	RTP#5_E SI 0285826	RTP#5_E SI 0285827		Notification of death. Email chain involving Christine Brown, Lisa Prather, Louis Shicker and others re Ortega Angel N33333.		
468	RTP#5_E SI 0047598	RTP#5_E SI 0047599		Email chain involving Louis Shicker, Eric Dailey, Bryan Gleckler and others re Vacant Wexford Positions.		
469	RTP#5_E SI 0592948	RTP#5_E SI 0592951		Email chain involving Joanna Kemmeren, Joseph Ssenfuma, Amber Allen, Kim Hugo and others re Update - reportable incident - Dixon Correctional Center - Offender Transport via ambulance - Hilliard, Wilbur C00287.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 115 of 124 PageID #:11129

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
470				Email from Louis Shicker to Arthur Funk and others re Offender Bahler, Daniel R27604.		
471	RTP#5_E SI 0257008	RTP#5_E SI 0257010		Email chain involving Michael Dempsey, Steven Meeks, Kim Hugo, Tina Jepsen and others re Death review policy - Spurlock M25641 - death at East Moline.		
472				Meeting Minutes from Quality Improvement Meeting - NRC [Word document produced without Bates numbers on 3/18/18 via email].		
473	RTP#5_E SI 0073974	RTP#5_E SI 0073977		Email chain involving Michael Dempsey, Kimberly Butler, Thomas Lehman, Joe Ebbitt and others re Sood at Hill.		
474	RTP#5_E SI 0184180	RTP#5_E SI 0184187		Email chain involving Michael Dempsey, Steven Meeks, Kim Hugo, Lisa Prather and others re Lawrence Correctional Center Concerns.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 116 of 124 PageID #:11130

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				Attachments email Lawrence CC summary of September 2016 infirmary audit, 434 9-28-16 DON ALLender.doc.		
475				Extracted pages from "death charts" of Venice Davis R37227 [produced without Bates numbers on 3/7/18 via email].		
476	RTP#5_E SI 0117065	RTP#5_E SI 0117067		Email chain between Lois Lindorff, Louis Shicker and Cindy Hobrock re Scan from a Xerox WorkCentre. Attachment appeal from offender re prosthetic foot held together with tape.		
477	RTP#5_E SI 0583462	RTP#5_E SI 0583464		Email chain involving Michael Dempsey, Charlie Weikel, Erin Johnson, Tina Jepsen and others re Requested Information. Attachment 5/12/17 East Moline Correctional Center Weekly Report.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 117 of 124 PageID #:11131

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
478				Email from Angelia Bruns		
				to Louis Shicker and Lisa		
				Prather re Requested		
				information from		
				PNKCC. Attachment June		
				2015 denials/not approved for Pinckneyville		
				Correctional Center.		
479				Email from George Penny		
417				to Louis Shicker, Lisa		
				Prather and Nigel Vinyard		
				re four denials.		
				Attachments non-		
				approved medical special		
				service referral requests.		
480				Email chain involving		
				Louis Shicker, Lisa		
				Prather, Gail Walls,		
				Annette Rodgers and		
				others re Dr. Trost call		
				lines. Attachment		
				spreadsheet of offenders		
				scheduled at least 3 times		
				before being seen by Dr.		
				Trost.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 118 of 124 PageID #:11132

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
481				Email from Louis Shicker to Daniel Towne, Marna Ross and Lisa Prather re [no subject]. Attachment RFP sub-committee contract language enhancements upgraded & enforceable target performances.		
482				Email from Louis Shicker to Daniel Towne, Marna Ross, Cindy Hobrock and Lisa Prather re [no subject]. Attachment Outcome studies - samples.		
483	RTP#5_E SI 0077607	RTP#5_E SI 0077608		Emails between Camile Lindsay, Gladyse Taylor, Jared Brunk and John Baldwin re Wexford RFP.		
484	RTP#5_E SI 0583091	RTP#5_E SI 0583139		Emails and meeting reminders involving Michael Dempsey, Charlie Weikel, Erin Johnson and others re IDOC and UIC Engagement. Attachments 3/16/17 OHS Quarterly		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 119 of 124 PageID #:11133

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				PowerPoint presentation and OHS strategic plan.		
485	RTP#5_E SI 0594383	RTP#5_E SI 0594384		Email chain involving Joseph Ssenfuma, Mary Ellen Grennan, Jackie Hammond and others re Med errors cart H-M.		
486	RTP#5_E SI 0622767	RTP#5_E SI 0622768		Emails between Lori Smalley, Lisa Johnson, Angel Wilson, Shelith Hansbro and Kim Hugo re Staffing.		
487				Emails between Tina Jepsen, Marna Ross, Louis Shicker and Amber Allen re Ochoa N92393.		
488				Emails between Amber Allen and Louis Shicker re Michael Anderson B53225.		
489				Email chain involving Louis Shicker, Lisa Prather, Arthur Funk and Shannis Stock-Jones re PNCK.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 120 of 124 PageID #:11134

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
490				Email from Angela Crain to Louis Shicker, Lisa Prather, Gail Walls and Nichole Lewis re Offender R29550		
491				Email chain involving Maria Peterson, Louis Shicker, Dede Short and others re Inquiry from the Illinois Department of Corrections.		
492				Email chain involving Louis Shicker, Lisa Prather, Gail Walls, Annette Rodgers and others re Dr. Trost call lines.		
493				Emails between Lisa Prather, Louis Shicker, Cindy Horbrock and Marna Ross re [how long are sites required to retain QI information before destroying?].		
494				Email chain involving Amy Williams, Louis Shicker, Lisa Prather, Christine Brown and		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 121 of 124 PageID #:11135

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				others re Update on McMahon B88072.		
495				Email chain involving Louis Shicker, Ralph Gauen and others re Enteritis.		
496				Email chain involving Lois Lindorff, Louis Shicker and others re Wexford denial of Boost.		
497				Email chain involving Lois Lindorff, Ruth Brown, Kayleigh Matus and others re Hill NF request Boost. Attachment NAN Nutritional Supplement Request.		
498				Email from Lois Lindorff to Louis Shicker, Marna Ross and others re Wexford denial of Boost.		
499				Email chain involving Ruth Brown, Louis Shicker, Lois Lindorff and		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 122 of 124 PageID #:11136

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
				others re Hill NF request Boost.		
500				Email chain involving Cindy Hobrock, Lisa Prather, Marna Ross, Louis Shicker and others re Branch M36257 - Boost.		
501			Medical Problems of State and Federal Prisoners and Jail Inmates, 2011-12, USDOJ Office of Justice Programs Bureau of Justice Statistics.			
502				Letter from Bill Edley, IDOC Chief of Administration to Daniel Conn, Wexford VP and CFO re Notice concerning IDOC staffing issues. Attached Wexford Program Adjustment Computation dated 3/31/06.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 123 of 124 PageID #:11137

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
503				Letter from Tony Small, IDOC CFO to Daniel Conn, Wexford VP and CFO re Notice concerning IDOC staffing issues, medical director and nursing vacancies.		
504				Letter from Eric Dailey, Office of Healthcare Purchasing to Nickolas Little, Wexford VP of Compliance and Business Affairs re ongoing Administrative Directive violations. Attachment spreadsheet of recurring AD violations.		
505	RTP#5_E SI 0590641	RTP#5_E SI 0590643		Email chain involving Joseph Ssenfuma, Michael Melvin, Jared Brunk, Steven Meeks and others re Pontiac CC.		
506	RPT#5_E SI 0594414	RPT#5_E SI 0594414		Email chain involving Joseph Ssenfuma, Kim Hugo, Miles Sherwin and others re NRC negative pressure rooms.		

Case: 1:10-cv-04603 Document #: 742-3 Filed: 09/14/18 Page 124 of 124 PageID #:11138

Ex.	BegBates	EndBates	Title (if available)	Description (if no title)	Defendants' Objections	Plaintiffs' Responses Plaintiffs received Defendants' objections at 2:00 pm on September 14. Plaintiffs will supplement this exhibit with their responses to the objections promptly next week.
507	RTP#5_E SI 0595522	RTP#5_E SI 0595524		Email chain involving Victor Calloway, Joseph Ssenfuma, Kim larson and others re MRSA log update.		
508	RTP#5_E SI 0215383	RTP#5_E SI 0215384		Email chain involving Amber Allen, Joseph Ssenfuma, Diana Sanders and others re Optometry.		
509	RTP#5_E SI 0409353	RTP#5_E SI 0409354		Email chain involving Joseph Ssenfuma, Kimg Hugo, Mary Ellen Grennan and Michael Dempsey re Grant A64188.		